

SUMMARY OF FEES SOUGHT

Timekeeper	Hours	Rate	Fees
Bonacorsi, Lauri A.	738.7	\$ 600.00	\$ 443,220.00
Craig, Laura K.	835.1	\$ 750.00	\$ 626,325.00
Ehrett, Mackenzi J.S.	206.0	\$ 600.00	\$ 123,600.00
Hay, Daniel J.	842.2	\$ 1,150.00	\$ 968,530.00
Rody, David M.	152.6	\$ 1,400.00	\$ 213,640.00
Todd, Gordon D.	457.7	\$ 1,400.00	\$ 640,780.00
Paralegals	289.5	\$ 250.00	\$ 72,375.00
TOTAL	3521.8		\$ 3,088,470.00

Weighted Average Rate	\$ 876.96
Leverage	4.3
Hours Per Month	66.4
Hours Written Off	276.80

Sidley Austin LLP

Timecard Detail

Client: Clear Channel Outdoor (051557)

Matter: City of New Rochelle (051557-40420)

Date Range: Inception - 01/23/2025

Timekeeper	Date Worked	Hours Worked	Narrative
Todd, Gordon D.	9/3/2020	0.30	Call with S. Llach regarding New Rochelle issue
Todd, Gordon D.	9/3/2020	0.20	Call with D. Hay regarding New Rochelle dispute
Hay, Daniel J.	9/4/2020	1.80	Review documents relating to New Rochelle litigation
Hay, Daniel J.	9/6/2020	0.70	Research relating to New Rochelle matter
Hay, Daniel J.	9/7/2020	1.20	Research background for New Rochelle matter
Hay, Daniel J.	9/21/2020	0.30	Call with M. Ehrett regarding New Rochelle matter
Ehrett, Mackenzi J.S.	9/21/2020	0.30	Call with D. Hay re: status of case, research questions
Hay, Daniel J.	9/22/2020	1.10	Research claims and litigation strategy
Hay, Daniel J.	9/23/2020	0.90	Review and comment on research from M. Ehrett regarding claims and litigation strategy
Ehrett, Mackenzi J.S.	9/23/2020	5.70	Research NY case law re potential litigation options, strategies for New Rochelle dispute
Todd, Gordon D.	9/23/2020	2.50	Review background materials in preparation for call with S. Llach
Hay, Daniel J.	9/24/2020	0.80	Outline claims for New Rochelle litigation
Hay, Daniel J.	9/24/2020	0.80	Call with S. Llach and G. Todd to discuss New Rochelle litigation
Hay, Daniel J.	9/24/2020	0.40	Review background materials for use in complaint
Hay, Daniel J.	9/24/2020	0.50	Research New York eminent domain procedure
Hay, Daniel J.	9/24/2020	0.70	Call with G. Todd to discuss New Rochelle matter
Hay, Daniel J.	9/24/2020	0.90	Review materials for New Rochelle
Hay, Daniel J.	9/24/2020	1.70	Research amortization for just compensation
Ehrett, Mackenzi J.S.	9/24/2020	1.50	Research follow up questions from D. Hay re: potential legal arguments against City of Rochelle, draft summary re the same to D. Hay
Todd, Gordon D.	9/24/2020	2.20	Continue to review background materials in preparation for call with S. Llach
Todd, Gordon D.	9/24/2020	0.80	Call with D. Hay and S. Llach to plan New Rochelle litigation
Hay, Daniel J.	9/25/2020	0.70	Research potential takings claims
Craig, Laura K.	9/25/2020	0.50	Review case background materials
Craig, Laura K.	9/25/2020	0.50	Call with D. Hay regarding case and research assignment
Todd, Gordon D.	9/25/2020	0.80	Review research into possible takings claim
Hay, Daniel J.	9/28/2020	0.50	Research New York eminent domain procedure law
Hay, Daniel J.	9/28/2020	0.40	Call with L. Mulherin and M. Ehrett to discuss New Rochelle matter
Hay, Daniel J.	9/28/2020	0.80	Review research for New Rochelle matter
Ehrett, Mackenzi J.S.	9/28/2020	1.80	Research and draft memo regarding questions re: NY's eminent domain law including procedural requirements
Ehrett, Mackenzi J.S.	9/28/2020	0.40	Call with D. Hay re: next research steps
Craig, Laura K.	9/28/2020	0.40	Call with D. Hay and M. Ehrett regarding project and research regarding jurisdiction
Hay, Daniel J.	9/29/2020	0.40	Call with L. Mulherin to discuss research on litigation strategy
Hay, Daniel J.	9/29/2020	0.60	Research takings case law
Hay, Daniel J.	9/30/2020	1.70	Review and comment on L. Mulherin and M. Ehrett's memoranda on litigation strategy
Hay, Daniel J.	9/30/2020	0.40	Research irreparable harm
Hay, Daniel J.	9/30/2020	0.50	Research state eminent domain procedure law
Ehrett, Mackenzi J.S.	9/30/2020	5.50	Research, draft memo to D. Hay re: assessment of potential litigation claims
Craig, Laura K.	9/30/2020	6.60	Research regarding substance and strategy for potential claims
Hay, Daniel J.	10/1/2020	0.40	Draft litigation strategy memorandum
Hay, Daniel J.	10/1/2020	1.30	Research just compensation remedy and whether amortization is permissible substitute
Craig, Laura K.	10/1/2020	1.10	Research regarding 5th Amendment and HBA claims
Hay, Daniel J.	10/2/2020	0.50	Call with G. Todd to discuss litigation strategy
Hay, Daniel J.	10/2/2020	2.50	Draft memorandum summarizing claims and litigation strategy
Hay, Daniel J.	10/2/2020	1.10	Draft FOIL request
Hay, Daniel J.	10/2/2020	0.50	Review M. Ehrett litigation strategy memorandum
Ehrett, Mackenzi J.S.	10/2/2020	4.30	Research D. Hay follow up questions re NY Eminent Domain Procedure Law and potential injunction, and draft memo re: the same
Todd, Gordon D.	10/2/2020	0.30	Conference with D. Hay regarding claims and justiciability issues
Hay, Daniel J.	10/3/2020	1.60	Draft memorandum summarizing claims and litigation strategy
Hay, Daniel J.	10/3/2020	1.40	Draft demand letter to City of New Rochelle
Ehrett, Mackenzi J.S.	10/3/2020	0.50	Review D. Hay memo re: potential claims, begin researching first amendment challenge to New Rochelle billboard code
Craig, Laura K.	10/3/2020	0.20	Review letter to City of New Rochelle; Begin follow up research regarding litigation options
Todd, Gordon D.	10/4/2020	0.70	Strategize regarding possible facial challenges to sign ordinance
Todd, Gordon D.	10/4/2020	0.20	Review and revise draft letter to City
Todd, Gordon D.	10/4/2020	0.20	Review and revise draft FOIL demand
Hay, Daniel J.	10/5/2020	0.20	Revise and submit FOIL request
Craig, Laura K.	10/5/2020	0.80	Research regarding potential legal claims
Hay, Daniel J.	10/6/2020	1.60	Draft demand letter to City
Hay, Daniel J.	10/6/2020	0.30	Research grounds for preliminary injunction
Hay, Daniel J.	10/6/2020	0.50	Research regarding potential legal claims
Hay, Daniel J.	10/6/2020	2.70	Draft outline of complaint and motion for preliminary injunction
Hay, Daniel J.	10/6/2020	0.30	Review M. Ehrett's research on state eminent domain procedure law
Ehrett, Mackenzi J.S.	10/6/2020	3.00	Research irreparable injury arguments for PI

Craig, Laura K.	10/6/2020	1.30	Research regarding potential legal claims
Todd, Gordon D.	10/6/2020	0.30	Review research into applicability of federal and state just comp laws to New Rochelle signs
Todd, Gordon D.	10/6/2020	0.80	Review and revise draft letter to City regarding removal demand
Ehrett, Mackenzi J.S.	10/7/2020	2.60	Research regarding potential legal claims
Craig, Laura K.	10/7/2020	4.30	Research regarding 8th Amendment and Equal Protection clause
Todd, Gordon D.	10/7/2020	0.80	Review and revise outline for complaint
Hay, Daniel J.	10/8/2020	0.70	Review L. Mulherin's research on excessive fines and summarize for G. Todd
Hay, Daniel J.	10/8/2020	0.30	Revise and finalize demand letter
Hay, Daniel J.	10/8/2020	0.30	Review research from M. Ehrett on First Amendment claim
Hay, Daniel J.	10/8/2020	1.20	Revise outline of complaint and motion for preliminary injunction based on further research and comments from G. Todd
Hay, Daniel J.	10/8/2020	0.70	Call with L. Mulherin and M. Ehrett regarding draft complaint outline
Ehrett, Mackenzi J.S.	10/8/2020	0.80	Phone call with D. Hay, L. Mulherin re: status of research, drafting complaint, motion for preliminary injunction
Ehrett, Mackenzi J.S.	10/8/2020	0.40	Research second circuit law re: irreparable injury
Craig, Laura K.	10/8/2020	0.80	Call with D. Hay and M. Ehrett regarding complaint drafting
Craig, Laura K.	10/8/2020	1.60	Research regarding 8th Amendment claim; Correspond with D. Hay and G. Todd regarding research
Todd, Gordon D.	10/8/2020	0.20	Finalize and send letter to City
Ehrett, Mackenzi J.S.	10/9/2020	0.50	Coordinate with L. Mulherin re: drafting of complaint
Craig, Laura K.	10/9/2020	0.50	Call with M. Ehrett regarding complaint assignments
Hay, Daniel J.	10/12/2020	0.80	Draft complaint
Ehrett, Mackenzi J.S.	10/12/2020	2.90	Begin drafting Complaint against City of New Rochelle
Craig, Laura K.	10/12/2020	1.20	Draft complaint sections, including research regarding allegations
Ehrett, Mackenzi J.S.	10/13/2020	4.00	Continue drafting complaint against City of New Rochelle
Craig, Laura K.	10/13/2020	2.90	Draft complaint, including research and communication with internal team regarding complaint
Hay, Daniel J.	10/14/2020	0.80	Draft New Rochelle complaint
Ehrett, Mackenzi J.S.	10/14/2020	1.80	Review, finalize draft complaint against the City of New Rochelle
Craig, Laura K.	10/14/2020	4.80	Draft complaint, including correspondence with M. Ehrett regarding same and research
Hay, Daniel J.	10/15/2020	1.30	Draft New Rochelle complaint
Ehrett, Mackenzi J.S.	10/15/2020	0.80	Review D. Hay outline re: drafting motion for preliminary injunction, coordinate with L. Mulherin re: drafting responsibilities
Craig, Laura K.	10/15/2020	2.00	Prepare for filing preliminary injunction, including call with M. Ehrett regarding draft motion and research regarding mechanics of filing a PI in SDNY
Hay, Daniel J.	10/16/2020	10.40	Draft complaint
Ehrett, Mackenzi J.S.	10/16/2020	2.10	Edit draft complaint to address additional issues identified by D. Hay
Craig, Laura K.	10/16/2020	0.50	Attention to complaint drafting and revision, including call with D. Hay and team correspondence
Hay, Daniel J.	10/17/2020	1.80	Revise complaint
Ehrett, Mackenzi J.S.	10/17/2020	1.50	Perform proofread of entire Complaint, address follow up comments, questions from D. Hay
Craig, Laura K.	10/17/2020	1.70	Revise draft complaint
Craig, Laura K.	10/18/2020	0.90	Research regarding punitive damages, including review of complaint draft and correspondence with D. Hay regarding research
Hay, Daniel J.	10/19/2020	0.60	Call with D. Rody, P. McGowan, and L. Mulherin regarding preliminary injunction procedure
Hay, Daniel J.	10/19/2020	0.60	Research issues relating to preliminary injunction motion
Hay, Daniel J.	10/19/2020	0.30	Draft FOIL request relating to amended billboard ordinance
Craig, Laura K.	10/19/2020	3.70	Draft motion for preliminary injunction, including research
Craig, Laura K.	10/19/2020	0.60	Call with D. Hay and SDNY docketing regarding PI filing in SDNY
Todd, Gordon D.	10/19/2020	3.20	Review and revise draft complaint
Todd, Gordon D.	10/19/2020	0.20	Review City Council meeting adopting amendments to sign ordinance
Todd, Gordon D.	10/19/2020	0.30	Review amendment to New Rochelle sign code and email S. Llach regarding same
Todd, Gordon D.	10/19/2020	0.20	Review and revise draft FOIL to New Rochelle regarding ordinance amendment
Todd, Gordon D.	10/19/2020	0.20	Review correspondence from New Rochelle and correspond with S. Llach and Sidley team re same
Rody, David M.	10/19/2020	0.50	Call with Sidley team re: strategy for filing P.I. in SDNY
Hay, Daniel J.	10/20/2020	1.20	Revise complaint based on edits from G. Todd
Ehrett, Mackenzi J.S.	10/20/2020	4.70	Begin drafting memorandum of law in support of motion for preliminary injunction
Ehrett, Mackenzi J.S.	10/20/2020	1.30	Research SDNY, 2nd Circuit precedent on establishing corporate citizenship for purposes of diversity jurisdiction, draft summary re the same to D. Hay
Ehrett, Mackenzi J.S.	10/20/2020	0.20	Call with L. Mulherin re: coordinating sections in brief supporting motion for preliminary injunction
Craig, Laura K.	10/20/2020	0.90	Research regarding causes of action in complaint
Craig, Laura K.	10/20/2020	2.00	Draft preliminary injunction, including research and call with M. Ehrett
Todd, Gordon D.	10/20/2020	3.20	Continue to work on draft complaint
Todd, Gordon D.	10/20/2020	0.30	Draft summary of claims and injunctive relief for S. Llach
Hay, Daniel J.	10/21/2020	1.40	Revise complaint based on edits from G. Todd
Ehrett, Mackenzi J.S.	10/21/2020	2.10	Continue drafting brief in support of preliminary injunction
Ehrett, Mackenzi J.S.	10/21/2020	1.30	Review background documents provided by client re New Rochelle RFP process, draft section of Complaint re RFP
Ehrett, Mackenzi J.S.	10/21/2020	2.50	Review N.Y. state law to confirm draft complaint asserts causes of actions for any state analogs to federal claims
Craig, Laura K.	10/21/2020	2.30	Revise complaint, including follow up research regarding tortious interference
Craig, Laura K.	10/21/2020	1.90	Draft one-pager for client regarding New Rochelle dispute
Ehrett, Mackenzi J.S.	10/22/2020	7.70	Complete draft memo of law in support of motion for preliminary injunction, combine with portions of draft prepared by L. Mulherin
Craig, Laura K.	10/22/2020	3.50	Draft preliminary injunction motion, including research regarding same
Craig, Laura K.	10/22/2020	0.80	Research regarding claim presentation, including drafting summary for D. Hay
Hay, Daniel J.	10/23/2020	0.50	Research Second Circuit standard for preliminary injunctions
Hay, Daniel J.	10/23/2020	0.50	Review draft motion for preliminary injunction

Hay, Daniel J.	10/23/2020	0.50	Call with S. Llach and G. Todd regarding New Rochelle matter
Hay, Daniel J.	10/23/2020	1.40	Research history of New Rochelle signs to determine date of build or expansion
Hay, Daniel J.	10/23/2020	0.20	Draft FOIL request to NY Thruway Authority
Ehrett, Mackenzi J.S.	10/23/2020	1.20	Research D. Hay questions re: Second Circuit's standard for preliminary injunction, begin drafting summary re: the same
Craig, Laura K.	10/23/2020	0.20	Finalize and send G. Todd request for certificate of good standing from Virginia Bar for SDNY pro hac vice
Todd, Gordon D.	10/23/2020	0.50	Call with S. Llach regarding possible outcomes
Todd, Gordon D.	10/23/2020	0.20	Finalize FOIL to NY Thruway for sign records
Hay, Daniel J.	10/24/2020	2.80	Revise motion for preliminary injunction
Hay, Daniel J.	10/25/2020	3.10	Revise motion for preliminary injunction
Hay, Daniel J.	10/26/2020	3.00	Revise motion for preliminary injunction
Hay, Daniel J.	10/26/2020	0.30	Call with L. Mulherin regarding preliminary injunction motion
Hay, Daniel J.	10/26/2020	1.60	Revise complaint based on comments from G. Todd
Ehrett, Mackenzi J.S.	10/26/2020	0.20	Exchange emails with D. Hay re: follow up research projects for draft complaint, draft motion for preliminary injunction
Craig, Laura K.	10/26/2020	3.30	Draft section of preliminary injunction motion regarding irreparable harm, including research and call with D. Hay regarding same
Todd, Gordon D.	10/26/2020	5.30	Review and revise draft complaint
Hay, Daniel J.	10/27/2020	5.20	Revise motion for preliminary injunction
Ehrett, Mackenzi J.S.	10/27/2020	1.10	Complete second circuit research re: "sufficiently important question" standard for preliminary injunction, draft summary re: the same to D. Hay
Ehrett, Mackenzi J.S.	10/27/2020	2.20	Research SDNY, Second Circuit law re: FRCP 65's ability for district court to impose a requirement that plaintiffs post a security bond in connection with their request for a preliminary injunction, draft summary document re: the same for D. Hay
Craig, Laura K.	10/27/2020	2.00	Review and revise complaint
Hay, Daniel J.	10/28/2020	0.60	Review and edit M. Ehrett's research on security requirement for preliminary injunction
Hay, Daniel J.	10/28/2020	3.30	Revise motion for preliminary injunction
Ehrett, Mackenzi J.S.	10/28/2020	1.40	Watch videos of September 15, 2020, September 22, 2020 City Council meeting to identify key quotes about City's rationale behind amending billboard ordinance
Ehrett, Mackenzi J.S.	10/28/2020	4.80	Incorporate D. Hay edits into draft memorandum of law support of request for preliminary injunction
Craig, Laura K.	10/28/2020	3.20	Revise preliminary injunction motion, including call with M. Ehrett regarding same
Hay, Daniel J.	10/29/2020	0.80	Revise motion for preliminary injunction
Hay, Daniel J.	10/30/2020	2.30	Revise complaint based on comments and materials from S. Llach
Hay, Daniel J.	10/30/2020	0.60	Draft email to L. Mulherin and M. Ehrett regarding additional steps before filing complaint and preliminary injunction
Hay, Daniel J.	10/30/2020	1.50	Revise complaint and preliminary injunction motion based on comments from G. Todd
Hay, Daniel J.	10/30/2020	0.30	Implement edits from S. Llach to motion for preliminary injunction
Ehrett, Mackenzi J.S.	10/30/2020	0.20	Finalize one-page summary re: FRCP 65's potential to require CCO to post a security bond in connection with request for a preliminary injunction
Craig, Laura K.	10/30/2020	0.10	Correspond regarding tasks needed to finalize complaint and motion with D. Hay and M. Ehrett
Craig, Laura K.	10/30/2020	1.70	Research regarding punitive damages, including correspondence with D. Hay regarding same
Todd, Gordon D.	10/30/2020	5.20	Review and revise draft PI motion
Rody, David M.	10/30/2020	0.20	Correspondence with Sidley team and client re: draft complaint
Hay, Daniel J.	10/31/2020	0.20	Draft FOIL to NY Thruway Authority
Todd, Gordon D.	10/31/2020	1.30	Continue to work on complaint including reviewing new inventory data, tax data, and revisions from S. Llach
Hay, Daniel J.	11/1/2020	0.50	Research recent amendment to state law regarding I-95 billboards
Hay, Daniel J.	11/2/2020	0.50	Call with L. Mulherin and M. Ehrett regarding complaint and preliminary injunction filing
Hay, Daniel J.	11/2/2020	0.50	Call with E. Herman about expert engagement
Hay, Daniel J.	11/2/2020	1.20	Review of lease files from New Rochelle
Hay, Daniel J.	11/2/2020	0.90	Call with J. Scharfberg, C. Pujol, S. Llach, and G. Todd about declarations
Hay, Daniel J.	11/2/2020	0.40	Prepare engagement letter for expert appraiser
Hay, Daniel J.	11/2/2020	0.60	Draft Lewis declaration
Ehrett, Mackenzi J.S.	11/2/2020	3.40	Begin drafting declaration in support of request for preliminary injunction
Ehrett, Mackenzi J.S.	11/2/2020	0.50	Update document re: FRCP 65 bond requirement to incorporate G. Todd feedback
Ehrett, Mackenzi J.S.	11/2/2020	0.50	Phone call with D. Hay, L. Mulherin re: status of outstanding projects preparing for filing complaint, request for preliminary injunction
Ehrett, Mackenzi J.S.	11/2/2020	0.40	Work on motions for pro hac vice admission
Craig, Laura K.	11/2/2020	0.50	Call with D. Hay and M. Ehrett regarding filings
Craig, Laura K.	11/2/2020	0.20	Review leases for New Rochelle billboards
Craig, Laura K.	11/2/2020	0.80	Prepare ancillary papers for filings
Craig, Laura K.	11/2/2020	1.70	Review draft preliminary injunction
Todd, Gordon D.	11/2/2020	1.50	Continue to work on Complaint, PI Motion, and FOILs
Todd, Gordon D.	11/2/2020	0.40	Review rules governing posting of PI bond
Todd, Gordon D.	11/2/2020	0.40	Review draft declarations
Todd, Gordon D.	11/2/2020	0.50	Call with E. Herman re valuation engagement
Todd, Gordon D.	11/2/2020	1.00	Call with clients regarding litigation strategy
Hay, Daniel J.	11/3/2020	2.50	Draft J. Scharfberg declaration
Hay, Daniel J.	11/3/2020	1.40	Draft C. Pujol declaration
Hay, Daniel J.	11/3/2020	0.30	Call with L. Mulherin regarding case filings and legal research
Hay, Daniel J.	11/3/2020	1.80	Revise complaint and motion for preliminary injunction based on comments from client and call with market personnel
Hay, Daniel J.	11/3/2020	0.50	Review chart of zoning locations
Hay, Daniel J.	11/3/2020	1.10	Revise complaint
Hay, Daniel J.	11/3/2020	0.30	Draft FOIL request to Thruway Authority

Hay, Daniel J.	11/3/2020	0.40	Research bond requirement for preliminary injunction motion
Hay, Daniel J.	11/3/2020	0.40	Revise civil cover sheet
Ehrett, Mackenzi J.S.	11/3/2020	2.20	Calculate likely range of security bond court would require in connection with issuance of preliminary injunction, draft summary re: the same to G. Todd, D. Hay
Ehrett, Mackenzi J.S.	11/3/2020	2.70	Review, edit draft J. Scharfberg, Pujol, S. Lewis declarations ISO preliminary injunction motion, cross check against preliminary injunction motion to confirm all facts are included in declarations
Craig, Laura K.	11/3/2020	4.90	Attention to finalizing preliminary injunction, including additional legal and factual research and preparation of ancillary documents
Todd, Gordon D.	11/3/2020	0.20	Correspond with S. Llach regarding bond analysis
Todd, Gordon D.	11/3/2020	1.00	Review and revise draft declarations i/s/o PI motion
Rody, David M.	11/3/2020	0.60	Correspondence with Sidley team re: PI motion and FOIL request
Rody, David M.	11/3/2020	1.60	Review and revise complaint
Hay, Daniel J.	11/4/2020	0.90	Revise notice of motion and draft proposed order
Hay, Daniel J.	11/4/2020	0.80	Revise declarations in support of motion for preliminary injunction
Hay, Daniel J.	11/4/2020	0.40	Prepare checklist of documents for preliminary injunction filing
Hay, Daniel J.	11/4/2020	0.30	Compile exhibits for complaint and declarations
Hay, Daniel J.	11/4/2020	1.00	Review and implement edits to motion for preliminary injunction
Hay, Daniel J.	11/4/2020	0.30	Call with NY Docketing department to prepare for filing
Hay, Daniel J.	11/4/2020	0.60	Revise complaint
Hay, Daniel J.	11/4/2020	0.80	Implement cite check edits to preliminary injunction motion and complaint
Hay, Daniel J.	11/4/2020	0.30	Prepare ancillary papers for filing
Ehrett, Mackenzi J.S.	11/4/2020	2.20	Incorporate pincites to declarations into motion for preliminary injunction
Ehrett, Mackenzi J.S.	11/4/2020	0.50	Prepare application for pro hac vice admission to SDNY
Keller, Pamala	11/4/2020	3.50	Review, cite check and revise Memorandum of Law in Support of Preliminary Injunction
Keller, Pamala	11/4/2020	0.80	Review and revise Complaint to include Bluebook citation formatting
Craig, Laura K.	11/4/2020	2.30	Attention to finalizing preliminary injunction, including preparation of ancillary documents (e.g., motions for pro hac vice) and review of draft
Todd, Gordon D.	11/4/2020	3.80	Final review of filing papers and discuss same with S. Llach
Rody, David M.	11/4/2020	2.20	Review and revise PI motion, proposed order, and notice
Rody, David M.	11/4/2020	0.40	Correspondence and conferences with Sidley team re: PI motion
Hay, Daniel J.	11/5/2020	0.90	Revise declarations in support of motion for preliminary injunction
Hay, Daniel J.	11/5/2020	0.70	Revise complaint and motion for preliminary injunction
Hay, Daniel J.	11/5/2020	5.30	Perform final proof, finalize, and supervise filing of complaint and motion for preliminary injunction
Ehrett, Mackenzi J.S.	11/5/2020	0.20	Respond to D. Hay emails re: tying down final factual details in preparation for filing complaint, request for preliminary injunction
Ehrett, Mackenzi J.S.	11/5/2020		Research Second Circuit, SDNY authority on first to file rule as determined by filing date or service date, draft summary re: the same to G. Todd
Ehrett, Mackenzi J.S.	11/5/2020	1.00	Cite check Memorandum of Law in Support of Preliminary Injunction
Craig, Laura K.	11/5/2020	3.70	Attention to finalizing filings, including review of drafts and research on outstanding items
Rody, David M.	11/5/2020	0.50	Correspondence with Sidley team re: filing motion and strategy
Hay, Daniel J.	11/6/2020	0.40	Coordinate service of complaint and motion for preliminary injunction
Hay, Daniel J.	11/6/2020	0.70	Research Judge Halpern's cases and individual rules of practice
Hay, Daniel J.	11/6/2020	0.30	Coordinate service of summons
Ehrett, Mackenzi J.S.	11/6/2020	0.30	Exchange emails with G. Todd re: Judge P. Halpern, assigned to suit against New Rochelle
Craig, Laura K.	11/6/2020		Research regarding assigned judge, including drafting summary and correspondence with internal team
Craig, Laura K.	11/6/2020	0.10	Monitor filings, including correspondence with docketing
Craig, Laura K.	11/9/2020	0.20	Review service of papers regarding complaint, including review of waiver forms/notice and internal correspondence regarding same
Ehrett, Mackenzi J.S.	11/10/2020	0.30	File pro hac vice application for admission to SDNY
Hay, Daniel J.	11/11/2020	0.20	Call with opposing counsel to discuss service and schedule
Hay, Daniel J.	11/11/2020	0.40	Coordinate filing of summonses and certificate of service
Craig, Laura K.	11/11/2020	0.30	Correspondence regarding ancillary filings (e.g., summons, waiver) with case team
Todd, Gordon D.	11/11/2020	0.40	Confer with Plaintiffs' counsel regarding service, schedule, and recusal issues
Hay, Daniel J.	11/12/2020	0.60	Review decisions from Judge Roman relevant to billboard dispute
Craig, Laura K.	11/12/2020		Research regarding new judge, including correspondence regarding same and review of judge policies
Rody, David M.	11/12/2020	0.30	Correspondence with Sidley team re: reassignment of case and next steps
Craig, Laura K.	11/15/2020	0.70	Review cases regarding issues in preliminary injunction from newly assigned judge
Hay, Daniel J.	11/16/2020	0.60	Research issues relating to briefing extension and effect of forbearance
Hay, Daniel J.	11/16/2020	0.40	Research New York precedent on public nuisance
Hay, Daniel J.	11/16/2020	0.30	Draft response to New Rochelle on briefing extension
Ehrett, Mackenzi J.S.	11/16/2020	0.50	Research Rule 65(c) bond requirement
Todd, Gordon D.	11/16/2020		Attention to briefing schedule including negotiations with City counsel, correspondence with S. Llach, and analysis of sign fine ordinance
Hay, Daniel J.	11/17/2020	0.30	Revise response to application for extension of time based on edits from D. Rody and G. Todd
Hay, Daniel J.	11/17/2020		Draft letter to the court and correspondence to opposing counsel regarding New Rochelle's request for a briefing extension
Hay, Daniel J.	11/17/2020	0.20	Review M. Ehrett's research on bond requirements
Hay, Daniel J.	11/17/2020	0.60	Revise opposition to extension application in response to letter from New Rochelle
Ehrett, Mackenzi J.S.	11/17/2020	0.20	Call SDNY clerk's office to obtain information re: posting bond if required by the Court
Todd, Gordon D.	11/17/2020	0.90	Continue to negotiate briefing schedule with New Rochelle
Todd, Gordon D.	11/17/2020	0.50	Review and revise letter brief to court regarding schedule
Rody, David M.	11/17/2020	0.50	Correspondence with team re: letter reply to City's motion for extension
Rody, David M.	11/17/2020	0.50	Review and comment on City's motion and client's response

Hay, Daniel J.	11/18/2020	0.60	Review L. Mulherin's research of Judge Roman's prior cases
Hay, Daniel J.	11/18/2020	0.70	Review E. Herman's revisions to expert engagement letter and implement edits from G. Todd and S. Llach
Craig, Laura K.	11/18/2020	2.20	Draft summary of Judge Roman decisions for D. Hay, including review of case law
Todd, Gordon D.	11/18/2020	0.20	Revise E. Harman engagement letter
Hay, Daniel J.	11/19/2020	0.30	Review L. Mulherin's research of Judge Roman's prior cases
Craig, Laura K.	11/19/2020	2.50	Draft summary regarding Judge Roman cases, including follow-up research
Hay, Daniel J.	11/20/2020	0.20	Review documents produced by New Rochelle pursuant to first FOIL request
Craig, Laura K.	11/20/2020	1.30	Review FOIL production, including drafting summary of production for D. Hay and reviewing leases to identify billboard lot numbers for follow-up FOIL request
Todd, Gordon D.	11/20/2020	0.30	Correspondence with S. Llach and D. Rody regarding Vector intervention
Rody, David M.	11/20/2020	0.20	Correspondence with Sidley team and counsel for potential co-plaintiff
Todd, Gordon D.	11/21/2020	0.20	Further correspondence with Vector counsel re intervention
Hay, Daniel J.	11/23/2020	0.30	Review and comment on emails from L. Mulherin concerning FOIL request and Judge Roman's prior decisions
Craig, Laura K.	11/23/2020	0.30	Finalize summary of Judge Roman cases for G. Todd and D. Rody
Hay, Daniel J.	11/24/2020	0.20	Draft email to New Rochelle regarding preservation of Aragon's emails
Hay, Daniel J.	11/24/2020	0.40	Revise Herman engagement letter
Hay, Daniel J.	11/24/2020	0.20	Review New Rochelle's response to second FOIL request and research invocation of inter-agency exemption
Todd, Gordon D.	11/24/2020	0.30	Attention to E. Herman engagement letter issues
Todd, Gordon D.	11/24/2020	0.20	Correspondence with Vector counsel
Todd, Gordon D.	11/24/2020	0.20	Correspondence with City counsel regarding Comm'r Aragon retirement
Craig, Laura K.	11/25/2020	2.20	Draft second FOIL request, including review of lease documents and prior requests/response
Craig, Laura K.	11/25/2020	0.50	Draft comparison table of ordinance no. 270 showing amendments over time
Hay, Daniel J.	11/26/2020	0.50	Review and comment on response to FOIL production drafted by L. Mulherin
Craig, Laura K.	11/27/2020	0.20	Finalize comparison table of New Rochelle Ordinance No. 270
Hay, Daniel J.	11/28/2020	0.30	Review research from L. Mulherin providing historical overview of the New Rochelle billboard ordinance
Craig, Laura K.	11/28/2020	0.10	Review comparison chart of New Rochelle Ordinance No. 270 to respond to D. Hay question regarding changes over time
Hay, Daniel J.	11/30/2020	0.30	Finalize E. Herman engagement letter
Craig, Laura K.	11/30/2020	0.90	Research regarding inter-agency deliberative process for FOIL requests
Todd, Gordon D.	11/30/2020	0.20	Review and revise E. Herman engagement
Todd, Gordon D.	11/30/2020	0.30	Review FOIL response status and assess need for follow-up communication
Hay, Daniel J.	12/1/2020	0.50	Revise response to FOIL responses
Craig, Laura K.	12/1/2020	0.20	Finalize draft FOIL response to New Rochelle
Todd, Gordon D.	12/1/2020	0.30	Finalize letter to New Rochelle pushing back on FOIL response
Hay, Daniel J.	12/2/2020	1.10	Review preliminary injunction and identify research projects to prepare for reply brief
Hay, Daniel J.	12/2/2020	0.30	Review Thruway Authority FOIL production
Hay, Daniel J.	12/2/2020	0.70	Research recent decisions applying Town of Gilbert
Todd, Gordon D.	12/2/2020	0.70	Review further correspondence re New Rochelle FOIL response and NY Thruway FOIL disclosure
Todd, Gordon D.	12/2/2020	0.20	Finalize E. Herman engagement
Craig, Laura K.	12/3/2020	0.70	Review NY Thru-way FOIL Response, including drafting summary of findings for D. Hay
Todd, Gordon D.	12/3/2020	0.40	Review documents produced in response to CCO FOIL to NY Thruway re OFM permits
Ehrett, Mackenzi J.S.	12/4/2020	1.00	Begin researching, outlining rebuttal arguments in response to City's opposition to request for preliminary injunction
Craig, Laura K.	12/4/2020	0.10	Correspond with G. Todd regarding Judge Roman case summary
Todd, Gordon D.	12/4/2020	0.30	Call with counsel for Vector Media regarding intervention and follow up correspondence with S. Llach re same
Ehrett, Mackenzi J.S.	12/7/2020	0.60	Research ability to attach additional declarations to reply briefing in support of application for preliminary injunction, draft summary re: the same
Ehrett, Mackenzi J.S.	12/7/2020	1.40	Research arguments supporting CCO's position that claim for preliminary injunction is ripe now, before billboards at issue are removed, draft summary re: the same
Hay, Daniel J.	12/9/2020	0.90	Draft response to NY Thruway Authority FOIL production
Todd, Gordon D.	12/10/2020	0.50	Review Judge Roman standing procedural orders
Todd, Gordon D.	12/10/2020	3.90	Review prior decisions by Judge Roman on relevant takings, due process, first amendment, and injunctive relief issues
Rody, David M.	12/10/2020	0.30	Correspondence with Sidley team and NYS Thruway Authority re: FOIL request
Hay, Daniel J.	12/14/2020	0.20	Call with E. Herman regarding initial valuation
Hay, Daniel J.	12/14/2020	1.70	Prepare common interest agreement with Vector Media
Ehrett, Mackenzi J.S.	12/14/2020	0.60	Review October, November, December 2020 minutes of New Rochelle City Council re: any changes, discussions of city's billboard ordinance
Todd, Gordon D.	12/14/2020	0.40	Calls with E. Harman and S. Llach re preliminary valuation
Todd, Gordon D.	12/14/2020	0.40	Work on common interest agreement with Vector
Todd, Gordon D.	12/14/2020	0.40	Review New Rochelle City Council agendas and local media and correspondence with D. Hay regarding regular monitoring of same for information regarding suit
Hay, Daniel J.	12/15/2020	1.70	Outline reply in support of motion for preliminary injunction
Hay, Daniel J.	12/15/2020	0.30	Draft summary of brief for G. Todd
Hay, Daniel J.	12/15/2020	1.70	Draft reply brief
Hay, Daniel J.	12/15/2020	1.10	Review opposition to motion for preliminary injunction
Hay, Daniel J.	12/15/2020	0.30	Research SDNY law on evidence submitted with reply briefs
Ehrett, Mackenzi J.S.	12/15/2020	1.80	Research NY, 2nd Cir. case law re: interpreting contractual provisions specifying a meaning "for purposes of" a contractual clause, draft summary re the same to D. Hay
Ehrett, Mackenzi J.S.	12/15/2020	0.70	Review City of New Rochelle's brief opposing Clear Channel's request for preliminary injunction
Craig, Laura K.	12/15/2020	0.50	Review opposition to preliminary injunction motion

Todd, Gordon D.	12/15/2020	0.30	Correspondence with S. Llach and D. Hay regarding New Rochelle opposition filing
Hay, Daniel J.	12/16/2020	0.50	Call with L. Mulherin and M. Ehrett regarding reply brief
Hay, Daniel J.	12/16/2020	0.70	Draft reply brief
Hay, Daniel J.	12/16/2020	2.60	Draft reply brief
Ehrett, Mackenzi J.S.	12/16/2020	0.40	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	12/16/2020	0.50	Call with D. Hay, L. Mulherin re: drafting reply brief in support of preliminary injunction
Craig, Laura K.	12/16/2020	1.40	Research and draft reply in support of motion for a preliminary injunction, including call with D. Hay and M. Ehrett regarding same
Todd, Gordon D.	12/16/2020	5.50	Close review of City's opposition brief, supporting materials, and cited authorities and draft detailed analysis for S. Llach
Hay, Daniel J.	12/17/2020	0.50	Call with S. Llach regarding opposition brief
Hay, Daniel J.	12/17/2020	2.70	Draft reply brief
Hay, Daniel J.	12/17/2020	1.00	Review legislative history of 1989 sign amendments
Ehrett, Mackenzi J.S.	12/17/2020	5.20	Begin researching, drafting reply brief in support of preliminary injunction, with attention to City's res judicata argument, reliance on Suffolk Outdoor Advertising v. Southampton
Craig, Laura K.	12/17/2020	2.10	Draft reply regarding private right of action under Section 88, including case law research
Todd, Gordon D.	12/17/2020	0.50	Call with D. Hay and S. Llach to strategize regarding the PI reply
Todd, Gordon D.	12/17/2020	0.20	Finalize and supply common interest agreement to Vector's counsel
Todd, Gordon D.	12/17/2020	0.60	Review legislative history to amendment to NY State just comp law
Todd, Gordon D.	12/17/2020	2.20	Review 2016 RFP materials and correspondence
Hay, Daniel J.	12/18/2020	2.00	Draft supplemental declaration in support of motion for preliminary injunction
Hay, Daniel J.	12/18/2020	0.30	Review documents from RFP and sign files
Hay, Daniel J.	12/18/2020	1.40	Draft reply in support of preliminary injunction motion
Ehrett, Mackenzi J.S.	12/18/2020	4.30	Continue drafting reply brief in support of Clear Channel's request for preliminary injunction with attention to arguments re: stipulation-based contract claims, first amendment claims
Craig, Laura K.	12/18/2020	1.20	Draft section of reply brief, including conducting case law research
Todd, Gordon D.	12/18/2020	0.50	Strategize with D. Hay regarding reply brief
Hay, Daniel J.	12/19/2020	1.10	Draft reply brief
Hay, Daniel J.	12/20/2020	1.40	Draft reply brief
Craig, Laura K.	12/20/2020	1.40	Draft reply in support of preliminary injunction, including research case law
Hay, Daniel J.	12/21/2020	0.20	Call with L. Mulherin to discuss reply brief
Hay, Daniel J.	12/21/2020	0.20	Draft request for oral argument
Hay, Daniel J.	12/21/2020	3.50	Draft reply brief
Craig, Laura K.	12/21/2020	1.70	Draft reply brief, including case law research and revisions to draft
Hay, Daniel J.	12/22/2020	1.20	Revise reply brief
Hay, Daniel J.	12/22/2020	0.60	Revise declaration of C. Pujol
Hay, Daniel J.	12/22/2020	3.20	Revise reply and declaration based on edits from L. Mulherin and new sign information
Ehrett, Mackenzi J.S.	12/22/2020	1.30	Perform follow-up research, drafting for reply brief in support of preliminary injunction based on D. Hay feedback
Craig, Laura K.	12/22/2020	3.80	Revise draft and supplemental declaration, including cite check and legal research
Todd, Gordon D.	12/22/2020	2.30	Review and revise draft reply brief
Hay, Daniel J.	12/23/2020	0.30	Research commercial speech of nonprofits
Hay, Daniel J.	12/23/2020	1.30	Review and implement G. Todd's edits to reply
Ehrett, Mackenzi J.S.	12/23/2020	0.20	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	12/23/2020	0.10	Review client-provided images of New Rochelle billboards for First Amendment argument
Hay, Daniel J.	12/24/2020	0.70	Revise Pujol declaration
Todd, Gordon D.	12/24/2020	0.60	Attention to reply brief
Rody, David M.	12/24/2020	2.40	Review and revise reply brief
Rody, David M.	12/24/2020	0.40	Correspondence with Sidley team re: reply brief
Hay, Daniel J.	12/25/2020	1.30	Revise reply based on D. Rody edits & draft page-limit extension request
Todd, Gordon D.	12/26/2020	3.80	Further review and revision of reply brief and supplemental declaration including attention to S. Llach edits
Rody, David M.	12/26/2020	0.40	Correspondence with Sidley team and client re: reply brief
Hay, Daniel J.	12/27/2020	2.00	Review and implement edits from G. Todd and S. Llach
Todd, Gordon D.	12/27/2020	0.70	Continue to work on reply brief
Rody, David M.	12/27/2020	0.80	Review and comment on revised reply brief
Hay, Daniel J.	12/28/2020	0.60	Revise reply brief
Hay, Daniel J.	12/28/2020	0.60	Revise Pujol declaration
Hay, Daniel J.	12/28/2020	1.30	Revise reply
Keller, Pamala	12/28/2020	3.30	Review, cite check and revise Reply in Support of Preliminary Injunction
Craig, Laura K.	12/28/2020	1.80	Finalize reply in support of motion for summary judgment, including preparing exhibits and follow-up legal research
Todd, Gordon D.	12/28/2020	0.20	Correspondence with D. Hay and S. Llach regarding FOIL request to NY Thruway
Todd, Gordon D.	12/28/2020	0.50	Finalize PI reply brief
Rody, David M.	12/28/2020	0.50	Correspondence with Sidley team re: finalizing reply brief
Hay, Daniel J.	12/29/2020	1.50	Final proof of reply brief and related filing
Hay, Daniel J.	12/29/2020	2.00	Finalize and coordinate filing of reply
Ehrett, Mackenzi J.S.	12/29/2020	0.50	Proofread reply brief, exchange emails with L. Mulherin re: first amendment argument
Keller, Pamala	12/29/2020	1.30	Cite check Reply in Support of Motion for Preliminary Injunction
Craig, Laura K.	12/29/2020	2.20	Finalize reply for filing, including review of draft and follow-up legal research
Todd, Gordon D.	12/29/2020	0.80	Final review of PI Reply brief and supporting materials
Todd, Gordon D.	12/29/2020	1.20	Review briefing in preparation for oral argument on PI motion
Rody, David M.	12/29/2020	0.30	Attention to finalizing and filing reply brief

Hay, Daniel J.	12/30/2020	0.30	Call with L. Mulherin regarding potential interlocutory appeal
Ehrett, Mackenzi J.S.	12/30/2020	0.20	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	12/30/2020	0.90	Compile preliminary injunction pleadings, declarations, attachments, exhibits binder for G. Todd, D. Hay
Ehrett, Mackenzi J.S.	12/30/2020	0.50	Coordinate with P. Keller to create oral argument binders of case, statutory authority, briefs, supporting declarations for G. Todd
Craig, Laura K.	12/30/2020	0.50	Research regarding injunction pending appeal, including call with D. Hay
Todd, Gordon D.	12/30/2020	0.30	Correspondence with Sidley team regarding preparation for PI hearing and emergency appeal if necessary
Todd, Gordon D.	12/30/2020	3.00	Continue preparation for oral argument on PI motion
Rody, David M.	12/30/2020	0.20	Review and comment on opposition filing by city
			Compile preliminary injunction pleadings, declarations, attachments, exhibits binder for G. Todd, D. Hay; coordinate with P. Keller re: legal authorities binder for G. Todd
Ehrett, Mackenzi J.S.	12/31/2020	1.30	Compile and organize materials cited in briefs for upcoming oral argument
Todd, Gordon D.	12/31/2020	0.20	Correspondence with S. Llach and D. Hay regarding preparation for PI hearing and emergency appeal if necessary
Craig, Laura K.	1/4/2021	0.40	Research regarding injunction pending appeal
Todd, Gordon D.	1/4/2021	0.30	Review litigation schedule for upcoming and anticipated motions or other issues
Todd, Gordon D.	1/4/2021	0.20	Correspondence with S. Llach and Sidley team regarding oral argument on PI motion
Todd, Gordon D.	1/4/2021	2.50	Prepare for oral argument
Hay, Daniel J.	1/5/2021	1.40	Review and edit L. Mulherin's research on injunctions pending appeal
Craig, Laura K.	1/5/2021	3.20	Research regarding motion for an injunction/stay pending appeal, including drafting summary of findings and correspondence with D. Hay
Todd, Gordon D.	1/5/2021	2.50	Prepare for oral argument
Todd, Gordon D.	1/5/2021	0.30	Confer with Vector's counsel regarding Vector complaint
Hay, Daniel J.	1/6/2021	0.60	Review and comment on L. Mulherin's one-pager on injunction pending appeal
Ehrett, Mackenzi J.S.	1/6/2021	0.30	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	1/6/2021	1.30	Revise summary of research regarding motion to stay/or injunction pending appeal, including case law research
Todd, Gordon D.	1/6/2021	0.30	Confer with Vector's counsel regarding Vector complaint
Todd, Gordon D.	1/6/2021	3.50	Prepare for oral argument
Hay, Daniel J.	1/7/2021	0.60	Research consequences of failure to answer
Hay, Daniel J.	1/7/2021	0.60	Review Mackenzi's findings on default and failure to timely file a motion
			Research SDNY, Second Circuit precedent re: defendant's forfeiture of right to file motion to dismiss when ignoring deadline for answering complaint or moving to dismiss, draft summary re: the same to D. Hay
Ehrett, Mackenzi J.S.	1/7/2021	2.40	
Craig, Laura K.	1/7/2021	0.20	Finalize summary of motion for stay/injunction pending appeal
Craig, Laura K.	1/7/2021	0.20	Correspondence regarding oral argument (including gathering materials for G. Todd) and response to complaint deadline
Todd, Gordon D.	1/7/2021	3.80	Prepare for oral argument
Hay, Daniel J.	1/8/2021	1.60	Review and edit M. Ehrett's letter on defendants' failure to answer
			Draft letter to Court notifying Court of Defendants' failure to timely respond to complaint, requesting court order compelling defendants to file answer in lieu of moving to dismiss, incorporate D. Hay edits to draft
Ehrett, Mackenzi J.S.	1/8/2021	2.80	
Todd, Gordon D.	1/8/2021	4.50	Prepare for oral argument
Rody, David M.	1/8/2021	0.40	Review and revise letter re: City's failure to answer
Hay, Daniel J.	1/9/2021	0.60	Revise letter to the court regarding failure to answer
Todd, Gordon D.	1/9/2021	0.30	Review and revise draft letter regarding defendants' default on response deadline
Todd, Gordon D.	1/9/2021	6.50	Prepare for oral argument
Hay, Daniel J.	1/10/2021	0.50	Research to help G. Todd prepare for argument
Craig, Laura K.	1/10/2021	0.90	Research regarding oral argument preparation
Todd, Gordon D.	1/10/2021	9.50	Prepare for oral argument
Hay, Daniel J.	1/11/2021	0.60	Argument prep research for G. Todd
Hay, Daniel J.	1/11/2021	0.80	Review and comment on Vector complaint
Hay, Daniel J.	1/11/2021	0.60	Finalize and file request for pre-motion letter regarding failure to answer
			Research whether New Rochelle's interim commissioner of development is automatically substituted as defendant under federal rules of civil procedure, whether injunctive relief equally lies against substituted public official, draft summary re: the same to D. Hay
Ehrett, Mackenzi J.S.	1/11/2021	0.90	Confirm docket entries, prepare caselaw to attach to letter to court re: New Rochelle's failure to answer complaint
Ehrett, Mackenzi J.S.	1/11/2021	0.50	Review, cite check and revise letter motion
Craig, Laura K.	1/11/2021	2.60	Research in preparation for oral argument
Todd, Gordon D.	1/11/2021	9.00	Prepare for oral argument
Rody, David M.	1/11/2021	0.70	Correspondence and conferences with Sidley team re: strategy for call to counsel and letter on MTD
Rody, David M.	1/11/2021	0.30	Correspondence and calls with counsel for New Rochelle re: MTD or answer
Hay, Daniel J.	1/12/2021	1.20	Review New Rochelle's answer
Hay, Daniel J.	1/12/2021	1.10	Round table to prepare for preliminary injunction argument
Hay, Daniel J.	1/12/2021	0.40	Research Second Circuit preliminary injunction standard with respect to need to satisfy elements individually versus sliding scale
Ehrett, Mackenzi J.S.	1/12/2021	2.00	Prepare for oral argument round table with G. Todd, D. Rody
Ehrett, Mackenzi J.S.	1/12/2021	1.50	Research G. Todd oral argument preparation questions, draft summary re: the same to G. Todd
Ehrett, Mackenzi J.S.	1/12/2021	1.10	Attend round table for G. Todd preliminary injunction oral argument prep
			Prepare for oral argument, including review of filings and draft Q&A and call with G. Todd, D. Hay, D. Rody, and M. Ehrett regarding same
Craig, Laura K.	1/12/2021	1.90	
Todd, Gordon D.	1/12/2021	0.50	Review and comment on Vector draft complaint

Todd, Gordon D.	1/12/2021	6.40	Prepare for oral argument
Rody, David M.	1/12/2021	1.20	Prepare for and participate in prep for oral argument on P.I. motion with Sidley team
Rody, David M.	1/12/2021	0.20	Attention to Vector complaint and New Rochelle answer
Ehrett, Mackenzi J.S.	1/13/2021	0.30	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	1/13/2021	0.40	Prepare filings for Second Circuit appeal
Todd, Gordon D.	1/13/2021	8.00	Prepare for oral argument
Rody, David M.	1/13/2021	1.00	Review Vector complaint and New Rochelle answer
Rody, David M.	1/13/2021	0.20	Correspondence with client and Sidley team in advance of oral argument
Hay, Daniel J.	1/14/2021	0.70	Draft scheduling proposal
Craig, Laura K.	1/14/2021	0.30	Post argument call with client and G. Todd, D. Rody, D. Hay, and E. Ehrett
Craig, Laura K.	1/14/2021	0.40	Draft and compile documents/forms for potential appeal to Second Circuit
Todd, Gordon D.	1/14/2021	4.00	Prepare for and participate in oral argument
Todd, Gordon D.	1/14/2021	1.00	Confer with S. Llach, B. Katz (Vector) and Sidley team following argument regarding next steps
Rody, David M.	1/14/2021	1.50	Prepare for call and call with court for oral argument on P.I. motion
Rody, David M.	1/14/2021	0.70	Correspondence and conferences with client and Sidley team re: oral argument
Hay, Daniel J.	1/15/2021	0.50	Call with L. Mackenzi and M. Ehrett regarding next steps in litigation and discovery
Hay, Daniel J.	1/15/2021	0.70	Draft joint letter to the court regarding forbearance and discovery
Ehrett, Mackenzi J.S.	1/15/2021	0.50	Conference call with D. Hay, L. Mulherin re: next steps in preparing for a 12(c) motion, discovery
Craig, Laura K.	1/15/2021	0.40	Call with D. Hay and M. Ehrett regarding post-oral argument projects
Todd, Gordon D.	1/15/2021	0.50	Correspondence with E. Rubin regarding meaning of stipulation para 14
Todd, Gordon D.	1/15/2021	0.30	Review and revise letter to court regarding stay and schedule
Todd, Gordon D.	1/15/2021	0.30	Confer with S. Llach regarding strategy
Todd, Gordon D.	1/15/2021	0.30	Confer with Vector counsel
Todd, Gordon D.	1/15/2021	0.40	Review and revise draft litigation schedule
Hay, Daniel J.	1/16/2021	0.20	Review and comment on revised scheduling proposal
Hay, Daniel J.	1/17/2021	0.70	Prepare draft scheduling order
Hay, Daniel J.	1/18/2021	0.70	Review and implement G. Todd and D. Rody's edits to proposed schedule
Hay, Daniel J.	1/18/2021	0.20	Review changes to joint letter regarding schedule
Hay, Daniel J.	1/18/2021	0.20	Draft response to New Rochelle on scheduling motion
Ehrett, Mackenzi J.S.	1/18/2021	2.20	Research D. Hay questions re: legal standards for filing, prevailing upon 12(c) motion for judgment on the pleadings, draft summary re: the same to D. Hay
Todd, Gordon D.	1/18/2021	0.20	Review and revise letter to Court re agreement
Todd, Gordon D.	1/18/2021	0.40	Review and revise draft case management order
Todd, Gordon D.	1/18/2021	0.40	Multiple correspondences with opposing counsel regarding letter to court and schedule
Rody, David M.	1/18/2021	1.00	Review and comment on proposed discovery schedule letter to opposing counsel, and case strategy
Hay, Daniel J.	1/19/2021	0.30	Revise proposed scheduling order
Hay, Daniel J.	1/19/2021	1.30	Review draft discovery requests
Craig, Laura K.	1/19/2021	0.20	Research regarding damages question
Craig, Laura K.	1/19/2021	0.50	Draft list of potential discovery requests
Todd, Gordon D.	1/19/2021	0.40	Finalize and circulate draft litigation schedule
Todd, Gordon D.	1/19/2021	0.30	Finalize letter to court
Rody, David M.	1/19/2021	0.50	Correspondence with Sidley team and adversary re: letter to court and discovery schedule
Hay, Daniel J.	1/20/2021	1.00	Review draft initial disclosure
Craig, Laura K.	1/20/2021	1.50	Draft discovery documents, including initial disclosures and working list of discovery requests
Hay, Daniel J.	1/21/2021	0.60	Revise proposed scheduling order
Hay, Daniel J.	1/21/2021	0.20	Calls with G. Todd and D. Rody regarding case schedule
Hay, Daniel J.	1/21/2021	0.30	Review and comment on draft discovery requests
Todd, Gordon D.	1/21/2021	0.50	Internal discussions with D. Rody and D. Hay and negotiations with City regarding expedited schedule
Rody, David M.	1/21/2021	0.70	Correspondence and conferences with Sidley team and counsel for City re: case management plan
Hay, Daniel J.	1/22/2021	1.30	Revise draft requests for production and admission
Ehrett, Mackenzi J.S.	1/22/2021	0.30	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	1/22/2021	2.60	Draft discovery requests, including Requests for Admission, Requests for Production, and disclosures
Todd, Gordon D.	1/22/2021	0.20	Call with Vector counsel regarding OFM permits
Rody, David M.	1/22/2021	0.60	Correspondence with Sidley team re: filing scheduling order and communications with counsel for landlord
Hay, Daniel J.	1/24/2021	0.30	Review M. Ehrett's research on Rule 12(c) motion
Craig, Laura K.	1/24/2021	1.20	Research regarding just compensation, including drafting summary to D. Hay
Craig, Laura K.	1/25/2021	0.80	Research regarding initial disclosures
Ehrett, Mackenzi J.S.	1/27/2021	0.10	Check for news stories re: Clear Channel's lawsuit against New Rochelle, other relevant updates, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Hay, Daniel J.	1/28/2021	0.20	Call with L. Mulherin regarding ESI protocol
Craig, Laura K.	1/28/2021	0.50	Research regarding discovery requirements in SDNY, including call with D. Hay regarding same
Rody, David M.	1/28/2021	0.20	Correspondence with Sidley team re: case management order and discovery plans
Hay, Daniel J.	1/29/2021	0.60	Call with G. Todd and D. Rody to discuss discovery
Hay, Daniel J.	1/29/2021	0.30	Review Outfront contract with New Rochelle
Hay, Daniel J.	1/29/2021	0.20	Review and respond to questions from L. Mulherin regarding discovery orders
Hay, Daniel J.	1/29/2021	0.60	Review L. Mulherin's draft protective order and ESI protocol
Ehrett, Mackenzi J.S.	1/29/2021	1.40	Research New York State attorneys fees statutes, draft summary re: the same to D. Hay
Craig, Laura K.	1/29/2021	3.70	Draft discovery documents, including ESI protocol and protective order
Todd, Gordon D.	1/29/2021	0.40	Confer with D. Hay, D. Rody regarding discovery and schedule
Todd, Gordon D.	1/29/2021	0.20	Review further FOIL correspondence with City and discuss FOIL strategy with D. Hay
Rody, David M.	1/29/2021	0.80	Correspondence and conferences with Sidley team re: discovery requests and strategy

Rody, David M.	1/29/2021	1.00	Review and comment on draft discovery requests
Hay, Daniel J.	1/31/2021	0.40	Review and implement G. Todd's and D. Rody's edits to discovery requests
Todd, Gordon D.	1/31/2021	0.80	Review and revise draft RFAs, RFPs and initial disclosures
Rody, David M.	1/31/2021	1.00	Review and comment on draft PO and ESI protocol
Rody, David M.	1/31/2021	0.60	documents
Hay, Daniel J.	2/1/2021	1.30	Review and implement revisions to discovery requests
Hay, Daniel J.	2/1/2021	0.40	Revise initial disclosure
Hay, Daniel J.	2/1/2021	0.50	Revise requests for production based on comments from G. Todd
			Prepare discovery filings, including protective order and discovery requests and call with D. Rody regarding same
Craig, Laura K.	2/1/2021	2.80	
Todd, Gordon D.	2/1/2021	1.80	Additional review and revision of draft discovery, initial disclosures, protective order, and ESI protocol
Rody, David M.	2/1/2021	1.00	Review and comment on revisions to draft RFPs, RFAs, and PO
Rody, David M.	2/1/2021	1.00	Correspondence and conferences with Sidley team re: draft discovery documents
Hay, Daniel J.	2/2/2021	0.40	Review correspondence regarding second set of requests for production
			Compare Clear Channel, Outfront BAFOs on New Rochelle advertising RFP, draft summary chart re: the same for D. Hay
Ehrett, Mackenzi J.S.	2/2/2021	0.60	
Craig, Laura K.	2/2/2021	0.20	Revise protective order
Todd, Gordon D.	2/2/2021	0.50	Work on drafts of confidentiality order, ESI order, and written discover
Rody, David M.	2/2/2021	0.80	Review and revise draft discovery requests and PO
Rody, David M.	2/2/2021	0.20	Correspondence with Sidley team re: discovery requests and PO
Rody, David M.	2/2/2021	0.20	Review, sign, and scan consolidation stipulation
Hay, Daniel J.	2/3/2021	0.90	Revise requests for production and admission
Hay, Daniel J.	2/3/2021	0.50	Review and implement G. Todd's edits to request for production and admission
Craig, Laura K.	2/3/2021	0.50	Review and proof discovery papers
Todd, Gordon D.	2/3/2021	1.50	Finalize drafts of confidentiality order, ESI order, and written discovery
Todd, Gordon D.	2/3/2021	0.20	Review City's initial disclosures
Rody, David M.	2/3/2021	0.50	Correspondence with Sidley team and City re: discovery requests and stipulation
Hay, Daniel J.	2/4/2021	1.00	Draft letter to New Rochelle counsel regarding FOIL requests
Hay, Daniel J.	2/4/2021	0.40	Revise discovery requests based on comments from S. Llach
			Check for news stories re: Clear Channel's lawsuit against New Rochelle, updates from New Rochelle city council, draft summary of news, city council updates to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	2/4/2021	0.30	
Todd, Gordon D.	2/4/2021	0.80	Review and draft response to correspondences from City regarding FOIL process
Rody, David M.	2/4/2021	0.50	Correspondence with Sidley team and City re: FOIL and discovery requests
Hay, Daniel J.	2/5/2021	0.20	Finalize and serve initial disclosures
Todd, Gordon D.	2/5/2021	0.40	Correspondence with City regarding FOIL demand and initial disclosures
Todd, Gordon D.	2/5/2021	0.30	Call with B. Katz (Vector) to coordinate discovery efforts
Hay, Daniel J.	2/7/2021	0.40	Finalize and proofread discovery requests
Hay, Daniel J.	2/8/2021	0.30	Correspond with C. Clinton about requests for production
Hay, Daniel J.	2/8/2021	0.50	Review New Rochelle's requests for production
Hay, Daniel J.	2/8/2021	0.30	Draft response to New Rochelle on FOIL requests
			Review New Rochelle requests for production, including correspondence regarding same and updating project tracker to include discovery requests
Craig, Laura K.	2/8/2021	0.10	
Todd, Gordon D.	2/8/2021	0.30	Review plaintiff's document requests and forward same to S. Llach
Rody, David M.	2/8/2021	0.30	Correspondence with Sidley team and City re: FOIL requests and discovery requests
Hay, Daniel J.	2/9/2021	0.40	Review FOIL response from N.Y. Thruway Authority
Rody, David M.	2/9/2021	0.50	Correspondence with Sidley team and client re: FOIL response
Hay, Daniel J.	2/10/2021	0.60	Call with L. Mulherin and M. Ehrett regarding responses to New Rochelle's requests for production
Ehrett, Mackenzi J.S.	2/10/2021	0.70	Call with D. Hay, L. Mulherin re: responses to New Rochelle's requests for production
Craig, Laura K.	2/10/2021	0.70	Review requests for production, including call with D. Hay and M. Ehrett regarding same
Todd, Gordon D.	2/10/2021	0.30	Call with Vector counsel regarding Outfront sign documents, permits and infirmities
			Check for news stories re: Clear Channel's lawsuit against New Rochelle, updates from New Rochelle city council, draft summary of news, city council updates, upcoming deadlines to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	2/11/2021	0.60	
Craig, Laura K.	2/11/2021	0.20	Draft table of discovery requests
Craig, Laura K.	2/12/2021	1.10	Draft trackers for discovery requests and deadlines, including review of responsive documents
Hay, Daniel J.	2/13/2021	0.70	Review L. Mulherin's proposal for collection
Craig, Laura K.	2/15/2021	0.10	Attention to discovery requests, including review of D. Hay comments to the RFP response summary
			Draft responses, objections to Clear Channel's requests for production of documents, including research into whether NY recognizes any doctrine of privilege applies to communications with a lobbyist
Ehrett, Mackenzi J.S.	2/16/2021	5.50	
Craig, Laura K.	2/16/2021	0.10	Call with M. Ehrett regarding discovery responses
Hay, Daniel J.	2/17/2021	2.30	Review and revise draft responses and objections to first set of requests for production
Ehrett, Mackenzi J.S.	2/17/2021	0.50	Edit draft objections, responses to City of New Rochelle's requests for production of documents
			Check for news stories re: Clear Channel's lawsuit against New Rochelle, updates from New Rochelle city council, draft summary of news, city council updates, upcoming deadlines to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	2/17/2021	0.30	
Hay, Daniel J.	2/18/2021	0.60	Call with C. Clinton and L. Mulherin regarding document collection
Hay, Daniel J.	2/18/2021	1.20	Revise responses and objections to New Rochelle's discovery requests
Craig, Laura K.	2/18/2021	0.60	Call with D. Hays and C. Clinton regarding responses to New Rochelle's discovery requests
Craig, Laura K.	2/18/2021	0.10	Review draft objections to RFPs
			Incorporate D. Hay edits into draft responses to New Rochelle RPDs, finalize draft for G. Todd, D. Rody
Ehrett, Mackenzi J.S.	2/19/2021	1.70	review
Craig, Laura K.	2/19/2021	0.30	Revise objections to RFPs
Craig, Laura K.	2/22/2021	0.10	Correspondence regarding productions
Todd, Gordon D.	2/22/2021	0.90	Review and revise response to City's RFP

Hay, Daniel J.	2/23/2021	0.60	Revise letter to Judge Krause regarding PO and ESI protocol
Ehrett, Mackenzi J.S.	2/23/2021	0.20	Review G. Todd edits, feedback to draft responses to document production responses, objections, email D. Hay re: the same
Craig, Laura K.	2/23/2021	1.90	Draft letter to M.J. Krause regarding ESI protocol and protective order
Rody, David M.	2/23/2021	0.50	Review and comment on Protective Order letter to Court (.3); correspondence with client and all parties re: Protective Order and ESI protocol (.2)
Ehrett, Mackenzi J.S.	2/24/2021	0.70	Incorporate G. Todd, D. Hay feedback into responses, objections to New Rochelle's requests for production of documents
Ehrett, Mackenzi J.S.	2/24/2021	0.40	Check for news stories re: Clear Channel's lawsuit against New Rochelle, updates from New Rochelle city council, draft summary of news, city council updates, upcoming deadlines to G. Todd, D. Rody, D. Hay
Craig, Laura K.	2/24/2021	0.60	Draft list of document requests to client, including correspondence regarding same
Craig, Laura K.	2/25/2021	0.60	Research regarding Clear Channel's response to requests for production, including correspondence with client regarding same
Craig, Laura K.	2/26/2021	0.40	Finalize and file letter to magistrate judge regarding ESI protocol and Protective Order
Craig, Laura K.	2/26/2021	0.10	Correspondence regarding discovery requests with client and D. Hay
Hay, Daniel J.	3/1/2021	0.40	Revise response to New Rochelle's request for production
Hay, Daniel J.	3/1/2021	0.40	Review documents provided by Clear Channel for production
Ehrett, Mackenzi J.S.	3/1/2021	2.30	Review lease file documents for responsiveness, privilege, confidentiality
Ehrett, Mackenzi J.S.	3/1/2021	0.50	Clean up draft responses to plaintiffs' request for document production, edit to reflect Court's entry of ESI Protocol
Craig, Laura K.	3/1/2021	0.40	Attention to discovery tasks, including review of documents provided by client and internal correspondence regarding same
Hay, Daniel J.	3/2/2021	0.50	Participate in status conference and follow-up discussion with G. Todd
Hay, Daniel J.	3/2/2021	0.40	Draft letter to Judge Krause regarding scheduling
Hay, Daniel J.	3/2/2021	0.20	Draft correspondence regarding discovery to L. Mulherin, M. Ehrett, and C. Clinton
Hay, Daniel J.	3/2/2021	0.30	Review proposed search terms for discovery collection
Ehrett, Mackenzi J.S.	3/2/2021	0.40	Incorporate D. Hay edits into responses, objections to defendant's document production requests
Ehrett, Mackenzi J.S.	3/2/2021	3.10	Review lease file documents for responsiveness, privilege, confidentiality
Craig, Laura K.	3/2/2021	1.10	Draft responses to discovery requests, including correspondence with C. Clinton and D. Hay regarding same
Todd, Gordon D.	3/2/2021	1.50	Prepare for and participate in conference with Magistrate Judge Krause
Todd, Gordon D.	3/2/2021	0.20	Confer with B. Katz (Vector) re consolidation and schedule
Hay, Daniel J.	3/3/2021	0.40	Revise list of proofs of performance to pull for discovery
Hay, Daniel J.	3/3/2021	0.40	Review proposed search terms and custodians
Ehrett, Mackenzi J.S.	3/3/2021	0.90	Review lease file documents for responsiveness, privilege, confidentiality
Craig, Laura K.	3/3/2021	0.30	Update RFP response tracker with documents and information from C. Clinton
Hay, Daniel J.	3/4/2021	0.50	Draft letter proposing search terms and custodians
Ehrett, Mackenzi J.S.	3/4/2021	3.50	Review lease file documents for responsiveness, privilege, confidentiality
Ehrett, Mackenzi J.S.	3/4/2021	0.60	Review New Rochelle city council videos re: discussion of Clear Channel, billboard ordinance, draft summary re: the same with other case updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	3/4/2021	0.10	Correspondence with C. Clinton and D. Hay regarding response to New Rochelle's RFPs
Ehrett, Mackenzi J.S.	3/5/2021	0.70	Complete review of lease file documents for responsiveness, privilege, confidentiality
Craig, Laura K.	3/5/2021	0.20	Correspondence regarding client collections and ESI search terms with D. Hay and C. Clinton
Hay, Daniel J.	3/8/2021	1.00	Review documents collected for first production
Ehrett, Mackenzi J.S.	3/9/2021	0.90	Update responsiveness coding to lease files based on D. Hay feedback, begin preparing documents for production to New Rochelle
Craig, Laura K.	3/9/2021	0.50	Review client collections for responsive documents to RFPs, including correspondence regarding production
Hay, Daniel J.	3/10/2021	0.30	Revise production cover letter
Hay, Daniel J.	3/10/2021	0.90	Proofread and finalize response to requests for production
Hay, Daniel J.	3/10/2021	0.50	Review discovery responses from New Rochelle
Hay, Daniel J.	3/10/2021	0.30	Draft email to L. Mulherin and M. Ehrett regarding letter to New Rochelle concerning request for admission responses
Hay, Daniel J.	3/10/2021	0.20	Draft email to New Rochelle concerning refusal to produce FOIL documents
Ehrett, Mackenzi J.S.	3/10/2021	1.30	Draft production cover letter re: lease file production, coordinate with lit support re: preparing document production, QC, send document production via secure FTP
Craig, Laura K.	3/10/2021	0.20	Attention to discovery tasks, including correspondence regarding Wednesday production
Todd, Gordon D.	3/10/2021	0.40	Work on discovery responses to City and receipt of City's discovery responses
Ehrett, Mackenzi J.S.	3/11/2021	0.50	Begin drafting deficiency letter re: City's refusal to produce certain documents requested by Clear Channel, provide responses to requests for admission
Ehrett, Mackenzi J.S.	3/11/2021	0.50	Review New Rochelle city council videos re: discussion of Clear Channel, billboard ordinance, draft summary re: the same with other case updates to G. Todd, D. Rody, D. Hay
Todd, Gordon D.	3/11/2021	1.20	Review City discovery responses to identify objectionable deficiencies and correspond with S. Llach regarding same
Hay, Daniel J.	3/12/2021	3.00	Revise deficiency letter regarding New Rochelle's first round of discovery responses
Ehrett, Mackenzi J.S.	3/12/2021	4.90	Finish researching, drafting deficiency letter re: City's deficient RFP, RFA responses
Hay, Daniel J.	3/13/2021	0.60	Revise deficiency letter regarding New Rochelle's initial discovery responses
Craig, Laura K.	3/13/2021	0.30	Revise draft letter regarding ESI search terms
Todd, Gordon D.	3/13/2021	0.30	Review and revise correspondence with City regarding search terms and privilege issues
Hay, Daniel J.	3/15/2021	0.30	Review M. Ehrett's revisions to deficiency letter
Ehrett, Mackenzi J.S.	3/15/2021	0.60	Incorporate D. Hay feedback into RFP, RFA responses deficiency letter to New Rochelle
Craig, Laura K.	3/15/2021	0.50	Review discovery materials, including drafting summary of expert reliance documents and preparing documents for Relativity upload
Hay, Daniel J.	3/16/2021	0.20	Call with B. Katz and L. Mulherin regarding search term proposals
Hay, Daniel J.	3/16/2021	0.50	Call with M. Ehrett and L. Mulherin regarding discovery status
Ehrett, Mackenzi J.S.	3/16/2021	0.50	review

Craig, Laura K.	3/16/2021	0.90	Attention to discovery work streams, including call with D. Hay and M. Ehrett regarding upcoming discovery tasks, revision of ESI search term proposal, and review of list of expert reliance materials
Craig, Laura K.	3/16/2021	0.20	Call with D. Hay and B. Katz regarding discovery proposal
Todd, Gordon D.	3/16/2021	0.20	Coordinate discovery planning between City and Vector
Ehrett, Mackenzi J.S.	3/17/2021	0.60	Review New Rochelle city council videos re: discussion of Clear Channel, billboard ordinance, draft summary re: the same with other case updates to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	3/17/2021	0.20	Incorporate G. Todd edits into deficiency letter to New Rochelle
Craig, Laura K.	3/18/2021	0.30	Revise ESI protocol, including correspondence with client and D. Hay regarding same
Hay, Daniel J.	3/19/2021	0.50	Review New Rochelle's proposed search terms
Craig, Laura K.	3/19/2021	0.40	Attention to discovery tasks, including review of ESI protocol and document productions
Todd, Gordon D.	3/19/2021	0.20	Review and revise deficiency letter
Hay, Daniel J.	3/21/2021	0.30	Review L. Mulherin's proposed search term revisions
Craig, Laura K.	3/21/2021	0.70	Draft response to New Rochelle's ESI proposal
Hay, Daniel J.	3/22/2021	0.40	Revise draft discovery deficiency letter
Hay, Daniel J.	3/22/2021	0.30	Review L. Mulherin's draft search terms letter to New Rochelle
			Attention to discovery tasks, including drafting letter regarding ESI proposal and review of documents
Craig, Laura K.	3/22/2021	2.50	for production
Todd, Gordon D.	3/22/2021	0.40	Review and revise response to City's proposed search terms and discovery protocol
Craig, Laura K.	3/23/2021	0.40	Attention to discovery tasks, including finalizing correspondence regarding search term proposal and production set
Craig, Laura K.	3/24/2021	2.10	Prepare document production, including review of documents and drafting production cover letter
Hay, Daniel J.	3/25/2021	0.40	Review of documents collected for production
Craig, Laura K.	3/25/2021	0.20	Manage ESI upload to Relativity space, including correspondence regarding document review with D. Hay and M. Ehrett
Ehrett, Mackenzi J.S.	3/26/2021	0.40	Call with L. Mulherin re: strategy for email document review
Ehrett, Mackenzi J.S.	3/26/2021	0.40	Draft list of highlighting terms for email document review to provide to lit support
Ehrett, Mackenzi J.S.	3/26/2021	0.70	Review New Rochelle city council, development committee videos from past week for discussion of Clear Channel, billboard ordinance, draft summary re: the same with other case updates to G. Todd, D. Rody, D. Hay
Craig, Laura K.	3/26/2021	1.90	Review documents for production
Craig, Laura K.	3/26/2021	0.40	Call with M. Ehrett regarding discovery tasks
Hay, Daniel J.	3/30/2021	0.40	Review hot documents identified by L. Mulherin
Hay, Daniel J.	3/30/2021	0.70	Call with S. Llach, J. King, J. Scharfberg, C. Pujol, and G. Todd regarding New Rochelle RFP
Hay, Daniel J.	3/30/2021	0.30	Call with G. Todd to discuss third party discovery
Hay, Daniel J.	3/30/2021	0.50	Research third-party discovery in SDNY
Hay, Daniel J.	3/30/2021	1.20	Review and comment on M. Ehrett's draft motion to compel RFA responses
Hay, Daniel J.	3/30/2021	0.50	Review documents identified as further review needed
Ehrett, Mackenzi J.S.	3/30/2021	1.60	Draft letter motion asking for City's non-answers to Clear Channel's RFAs to be deemed admitted or, alternatively, compelling City to provide proper answers
Craig, Laura K.	3/30/2021	0.70	Draft summary of document review issue for G. Todd, including correspondence with D. Hay
Todd, Gordon D.	3/30/2021	0.30	Confer with D. Hay regarding additional discovery to serve on various individuals
Todd, Gordon D.	3/30/2021	0.80	Call with NY market team, S. Llach & D. Hay regarding history of NewRoc RFP
Hay, Daniel J.	3/31/2021	0.40	Call with L. Mulherin and M. Ehrett to discuss third-party discovery
Hay, Daniel J.	3/31/2021	0.20	Coordinate records pull for old New Rochelle case
Hay, Daniel J.	3/31/2021	0.40	Review New Rochelle's response to deficiency letter
Ehrett, Mackenzi J.S.	3/31/2021	0.50	Call with D. Hay re: drafting third party discovery
Ehrett, Mackenzi J.S.	3/31/2021	1.10	Research N.Y. case law re: zoning status is question of fact
Craig, Laura K.	3/31/2021	0.70	Attention to discovery tasks, including call with D. Hay and M. Ehrett regarding same and review of correspondence with New Rochelle's counsel
Todd, Gordon D.	3/31/2021	0.30	Work on discovery response strategy in advance of status conference with magistrate judge
Rody, David M.	3/31/2021	0.50	Correspondence with Sidley team and City attorneys re: discovery requests
Hay, Daniel J.	4/1/2021	0.60	Review documents flagged for further review
Ehrett, Mackenzi J.S.	4/1/2021	3.60	Review documents for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Craig, Laura K.	4/1/2021	1.70	Attention to discovery work streams, including review of documents and research into third party discovery issues
Ehrett, Mackenzi J.S.	4/2/2021	1.70	Review documents for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Craig, Laura K.	4/2/2021	5.80	Attention to discovery work streams, including review of documents and drafting/research regarding Aragon subpoena
Hay, Daniel J.	4/4/2021	0.30	Prepare for meet and confer with New Rochelle
Craig, Laura K.	4/4/2021	0.10	Review transcript of pre-bid meeting
Hay, Daniel J.	4/5/2021	0.30	Review draft subpoena of L. Aragon
Hay, Daniel J.	4/5/2021	0.20	Call with G. Todd to discuss third party discovery and meet and confer
Hay, Daniel J.	4/5/2021	0.30	Meet with G. Todd, D. Rody, and M. Ehrett to discuss meet and confer with New Rochelle
Hay, Daniel J.	4/5/2021	0.20	Call with G. Todd and B. Katz to discuss third-party discovery
Hay, Daniel J.	4/5/2021	0.70	Draft summary of meet and confer and request for adjournment
Hay, Daniel J.	4/5/2021	0.40	Meet and confer with New Rochelle
Ehrett, Mackenzi J.S.	4/5/2021	3.00	Review documents for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Ehrett, Mackenzi J.S.	4/5/2021	0.20	Attend call with G. Todd, D. Rody, D. Hay re: preparation for meet, confer conference with New Rochelle re: deficient RFA responses
Craig, Laura K.	4/5/2021	1.60	Review documents for production
Craig, Laura K.	4/5/2021	0.90	Draft third party subpoenas
Todd, Gordon D.	4/5/2021	0.40	Calls with D. Hay and D. Rody to coordinate discovery issues with Vector and prepare for meet and confer

Todd, Gordon D.	4/5/2021	0.40	Call with counsel for city to meet and confer on discovery issues
Todd, Gordon D.	4/5/2021	0.30	Call with Vector counsel regarding discovery status and possible targeted subpoena into OFM signs
Rody, David M.	4/5/2021	0.40	Correspondence and conferences with Sidley team re: meeting with counsel for City
Hay, Daniel J.	4/6/2021	0.50	Review draft subpoenas of L. Aragon and M. Schwartz
Hay, Daniel J.	4/6/2021	1.10	Review documents identified as further review required
			Review documents for first email production for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Ehrett, Mackenzi J.S.	4/6/2021	3.80	Review documents for production
Craig, Laura K.	4/6/2021	2.20	Draft third party subpoenas
Craig, Laura K.	4/6/2021	1.40	Revise draft subpoenas to Outfront Media, M. Schwartz, and L. Aragon
Hay, Daniel J.	4/7/2021	0.40	Review and respond to L. Mulherin's summary of outstanding discovery items
			Review documents for first email production for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Ehrett, Mackenzi J.S.	4/7/2021	1.50	Draft third party subpoenas
Craig, Laura K.	4/7/2021	2.10	Review documents for production
Craig, Laura K.	4/8/2021	1.50	Review documents for production
			Review documents for first email production for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Ehrett, Mackenzi J.S.	4/9/2021	1.20	Attention to discovery matters, including review of documents and permit documentation
Hay, Daniel J.	4/11/2021	0.80	Review collection of state permits
Hay, Daniel J.	4/11/2021	0.40	Review and comment on L. Mulherin's summary of permit research
Craig, Laura K.	4/11/2021	0.80	Research regarding sign permitting requirements
			Review city council (and subcommittee) videos for references to New Rochelle billboards, references to Clear Channel's litigation, etc., draft summary re: the same to G. Todd, D. Hay
Ehrett, Mackenzi J.S.	4/12/2021	0.90	Complete review of documents for first email production for responsiveness, privilege, confidentiality, identify key documents for creation of master chronology
Craig, Laura K.	4/12/2021	0.70	Draft summary of permit documentation, including review of documents
			Draft template for creation of master chronology, coordinate with A. Reilly re: importing basic information from key documents into master chronology
Ehrett, Mackenzi J.S.	4/13/2021	0.80	Prepare chronology of key documents for M. Ehrett
Reilly, Ally N.	4/13/2021	0.70	Attention to discovery work streams, including review of documents and correspondence regarding FOIL requests
Craig, Laura K.	4/13/2021	0.80	Review FOIL requests and responses regarding NY Thruway signs and instruct L. Mulherin on further research
Todd, Gordon D.	4/13/2021	0.30	Prepare chronology of key documents for M. Ehrett
Reilly, Ally N.	4/14/2021	5.70	Attention to discovery work streams, including review of documents and correspondence regarding subpoenas and document production issues
Hay, Daniel J.	4/15/2021	0.30	Review documents relating to sunset of billboards
Reilly, Ally N.	4/15/2021	0.60	Prepare chronology of key documents for M. Ehrett
Craig, Laura K.	4/15/2021	0.20	Attention to discovery workstreams, including correspondence with G. Todd and D. Hay regarding subpoenas and document production issues
Todd, Gordon D.	4/15/2021	0.50	Review and revise third party subpoenas
			Review concerning documents pulled during review regarding scope of prior settlement and email S. Llach regarding same
Todd, Gordon D.	4/15/2021	1.10	Call with L. Mulherin regarding FOIL productions, permits, and interrogatories
Hay, Daniel J.	4/16/2021	0.50	Review Universal Outdoor docket
Craig, Laura K.	4/16/2021	0.40	Review FOIL issues, including call with D. Hay regarding same
			Further review of documents regarding sunset provision in New Rochelle settlement agreement and correspond with S. Llach regarding same
Todd, Gordon D.	4/16/2021	0.60	Draft list of questions for call with NY market employees regarding FOIL requests
Craig, Laura K.	4/18/2021	0.10	Draft interrogatories to New Rochelle
Ehrett, Mackenzi J.S.	4/19/2021	4.00	Revise draft interrogatories to New Rochelle
Ehrett, Mackenzi J.S.	4/20/2021	0.60	Add document description summaries to case chronology
Ehrett, Mackenzi J.S.	4/20/2021	0.50	Attention to discovery issues, including revisions to interrogatories and correspondence regarding permit review
Craig, Laura K.	4/20/2021	0.50	Review and revise first set of interrogatories
Hay, Daniel J.	4/21/2021	1.20	Analyze documents from Universal Outdoor v. New Rochelle litigation file, begin drafting summary re: the same to D. Hay
Ehrett, Mackenzi J.S.	4/21/2021	2.20	Review New Rochelle city council videos for any discussion of issues relevant to litigation, draft summary re: the same to G. Todd, D. Rody, D. Hay
Ehrett, Mackenzi J.S.	4/21/2021	0.80	Incorporate D. Hay edits into first set of interrogatories, begin draft of second set of interrogatories for later in discovery process
Ehrett, Mackenzi J.S.	4/22/2021	0.80	Attention to discovery matters, including versions to subpoenas and permit review
Craig, Laura K.	4/22/2021	0.50	Review draft interrogatories
Hay, Daniel J.	4/23/2021	0.50	Finalize draft second set of interrogatories to New Rochelle for G. Todd review
Ehrett, Mackenzi J.S.	4/23/2021	3.60	Finish reviewing litigation file for Universal Outdoor v. New Rochelle, draft summary re: how contemporary communications characterized stipulation's immunity provision, potential obligation to disclose documents in response to New Rochelle document requests to D. Hay,
Werner, Cole M.	4/23/2021	1.00	Create Permit contract chronology chart working with L. Mulherin
Hay, Daniel J.	4/24/2021	1.00	Draft summary of Universal Outdoor documents
			Review select pleadings and correspondence records from 1998 litigation for relevance to current dispute
Todd, Gordon D.	4/24/2021	1.50	Review draft interrogatories to serve on New Rochelle
Hay, Daniel J.	4/25/2021	0.30	Review G. Todd's revisions to draft interrogatories
Ehrett, Mackenzi J.S.	4/26/2021	1.10	Incorporate G. Todd feedback into first set of interrogatories, draft second set of document production requests
Hay, Daniel J.	4/27/2021	0.30	Draft email to New Rochelle regarding failure to respond to discovery inquiries
Hay, Daniel J.	4/27/2021	0.90	Review and revise second set of requests for production
Ehrett, Mackenzi J.S.	4/27/2021	3.50	Add document descriptions to key documents identified for chronology document

Craig, Laura K.	4/27/2021	0.80	Attention to NY Thruway permit review, including call with G. Todd and D. Hay regarding same and draft updates to permit table
Todd, Gordon D.	4/27/2021	0.30	Confer with D. Hay and L. Mulherin regarding revisiting sign permit issue
Hay, Daniel J.	4/28/2021	0.40	Review drafts of third-party discovery requests and interrogatories
Hay, Daniel J.	4/28/2021	0.60	Call with L. Mulherin and M. Ehrett regarding discovery status
Hay, Daniel J.	4/28/2021	0.30	Draft email to S. Llach regarding upcoming discovery requests
Hay, Daniel J.	4/28/2021	0.50	Research prior testimony of potential land use expert
Ehrett, Mackenzi J.S.	4/28/2021	0.60	Attend strategy call with D. Hay, L. Mulherin re: status of outstanding projects, upcoming deadlines
Craig, Laura K.	4/28/2021	1.10	Attention to discovery work streams, including drafting talking points for call with magistrate judge and call with D. Hay and M. Ehrett
Todd, Gordon D.	4/28/2021	0.80	Review and revise draft discovery to City and third parties and correspond with Sidley team re same
Hay, Daniel J.	4/29/2021	0.40	Revise discovery requests based on comments from S. Llach
Hay, Daniel J.	4/29/2021	0.30	Review L. Mulherin's revisions to first set of interrogatories
Hay, Daniel J.	4/29/2021	0.20	Review documents identified for production by L. Mulherin
Ehrett, Mackenzi J.S.	4/29/2021	0.40	Add description of key documents to chronology
Ehrett, Mackenzi J.S.	4/29/2021	1.00	Research S.D.N.Y. precedent re: interrogatories containing discrete subparts, probing affirmative defenses, draft summary re: the same to D. Hay
Ehrett, Mackenzi J.S.	4/29/2021	0.60	Review New Rochelle city council videos for discussion of relevant litigation topics, handoff responsibility for future monitoring to C. Werner, draft summary of the same to D. Hay, L. Mulherin
Craig, Laura K.	4/29/2021	1.40	Attention to discovery workstreams, including review of draft interrogatories, requests for production, third party subpoenas, and proposed production documents
Hay, Daniel J.	4/30/2021	0.20	Call with L. Mulherin regarding discovery requests
Hay, Daniel J.	4/30/2021	0.40	Review New Rochelle's first set of interrogatories
Hay, Daniel J.	4/30/2021	0.60	Finalize and serve discovery requests and third production
Ehrett, Mackenzi J.S.	4/30/2021	2.80	Complete addition of documents to master chronology
Craig, Laura K.	4/30/2021	2.00	Attention to discovery work streams, including finalizing production, subpoenas, requests for production, and interrogatories
Todd, Gordon D.	4/30/2021	0.80	Review and revise interrogatories to City and discuss same with D. Hay and L. Mulherin
Hay, Daniel J.	5/3/2021	1.00	Review documents produced by New Rochelle
Craig, Laura K.	5/3/2021	0.20	Attention to discovery matters, including upload of City production and internal correspondence regarding same
Hay, Daniel J.	5/4/2021	0.50	Call with L. Mulherin regarding interrogatory responses
Hay, Daniel J.	5/4/2021	0.60	Review L. Mulherin's draft responses to New Rochelle's interrogatories
Hay, Daniel J.	5/5/2021	1.10	Revise expert engagement letter
Hay, Daniel J.	5/7/2021	0.40	Review and comment on L. Mulherin's draft talking points for May status conference
Hay, Daniel J.	5/7/2021	1.00	Draft letter to magistrate judge regarding New Rochelle's discovery deficiencies
Craig, Laura K.	5/7/2021	0.80	Attention to discovery matters, including revision of talking points and letter to the court, review of service issues, and call with D. Hay regarding same
Hay, Daniel J.	5/8/2021	0.90	Review images of documents in New Rochelle's second production
Hay, Daniel J.	5/9/2021	0.40	Revise letter to the court regarding New Rochelle's discovery deficiencies
Craig, Laura K.	5/10/2021	1.60	Attention to discovery matters, including preparing master permit table, reviewing New Rochelle's productions, and finalizing letter to Magistrate Judge and Talking Points
Todd, Gordon D.	5/10/2021	0.20	Review correspondence with City regarding discovery issues
Todd, Gordon D.	5/10/2021	0.50	Review and revise letter to MJ Krause regarding City's discovery deficiencies
Craig, Laura K.	5/11/2021	4.20	Attention to discovery matters, including discussions with G. Todd regarding conference, revisions to talking points for conference, drafting chronology of communications for conference, and review of permit documentation and New Rochelle's productions
Todd, Gordon D.	5/11/2021	1.00	Prepare for status conference with MJ Krause, including review of prior correspondence and conference with L. Mulherin
Todd, Gordon D.	5/11/2021	1.50	Review City's document production relating to RFP and Transit Realty Associates
Rody, David M.	5/11/2021	0.20	Correspondence with Sidley team re: discovery issues with City
Craig, Laura K.	5/12/2021	1.00	Attention to discovery matters, including preparation for hearing with Magistrate regarding discovery issues
Craig, Laura K.	5/12/2021	1.10	Attend hearing with Magistrate Judge regarding discovery dispute
Craig, Laura K.	5/13/2021	2.50	Attention to discovery matters, including research regarding permit requirements and drafting revisions to scheduling order
Craig, Laura K.	5/14/2021	1.10	Finalize permit research, including revisions to draft summary, revisions to master permit table, and document review
Craig, Laura K.	5/17/2021	0.20	Review interrogatories summary from client, including correspondence with D. Hay regarding same
Hay, Daniel J.	5/18/2021	1.20	Revise draft interrogatory responses
Craig, Laura K.	5/18/2021	3.10	Draft interrogatories responses
Hay, Daniel J.	5/19/2021	0.60	Revise draft interrogatory responses
Hay, Daniel J.	5/19/2021	0.50	Calls with L. Mulherin regarding response to interrogatories
Hay, Daniel J.	5/19/2021	0.40	Revise responses to New Rochelle's first set of interrogatories
Craig, Laura K.	5/19/2021	0.60	Revise interrogatories, including calls with D. Hay regarding same
Hay, Daniel J.	5/20/2021	1.20	Revise responses to New Rochelle's first set of interrogatories
Hay, Daniel J.	5/20/2021	1.30	Revise interrogatory responses
Hay, Daniel J.	5/21/2021	0.40	Revise response to interrogatories
Reilly, Ally N.	5/21/2021	2.60	Prepare lease agreement documents ahead of review by attorney team for L. Mulherin
Craig, Laura K.	5/21/2021	0.20	Revise interrogatory responses
Craig, Laura K.	5/21/2021	0.20	Call with A. Reilly regarding lease review
Craig, Laura K.	5/22/2021	0.10	Finalize draft interrogatories
Reilly, Ally N.	5/24/2021	3.90	Prepare lease agreement documents ahead of review by attorney team for L. Mulherin
Craig, Laura K.	5/24/2021	1.40	Draft subpoena to TRA
Reilly, Ally N.	5/25/2021	3.00	Prepare lease agreement documents ahead of review by attorney team for L. Mulherin
Hay, Daniel J.	5/26/2021	0.40	Correspond with opposing counsel regarding document discovery

Craig, Laura K.	5/26/2021	0.10	Attention to discovery issues, including review factual summary for interrogatory responses, correspondence with D. Hay and C. Clinton regarding interrogatories, correspondence regarding meet and confer
Todd, Gordon D.	5/26/2021	0.30	Correspondence with City regarding discovery issues
Craig, Laura K.	5/27/2021	0.30	Attention to discovery matters, including correspondence with opposing counsel and D. Hay
Hay, Daniel J.	5/28/2021	2.00	Review documents identified for production
Craig, Laura K.	5/28/2021	0.20	Prepare production searches for D. Hay
Hay, Daniel J.	5/29/2021	1.20	Review documents identified for production
			Review prior correspondence and draft talking points to prepare for meet and confer with New Rochelle
Hay, Daniel J.	5/31/2021	0.50	
Hay, Daniel J.	6/1/2021	0.60	Draft response to New Rochelle's discovery letter
			Meet and confer with New Rochelle and follow up with G. Todd and L. Mulherin regarding discovery status
Hay, Daniel J.	6/1/2021	0.70	
Hay, Daniel J.	6/1/2021	0.60	Review documents for follow up from meet and confer
Hay, Daniel J.	6/1/2021	0.70	Review financial data for interrogatory responses
Hay, Daniel J.	6/1/2021	1.20	Revise interrogatory responses
			Attention to discovery matters, including meet and confer with opposing counsel, post-call with G. Todd and D. Hay, and interrogatories matters
Craig, Laura K.	6/1/2021	1.70	
Todd, Gordon D.	6/1/2021	1.50	Prepare for and participate in meet and confer with City's counsel regarding discovery issues
Todd, Gordon D.	6/1/2021	1.00	Multiple follow-up calls and communications with city counsel regarding discovery issues
Rody, David M.	6/1/2021	0.50	Correspondence with Sidley team and counsel for City re: discovery disputes
Hay, Daniel J.	6/2/2021	0.40	Call with G. Todd and L. Mulherin regarding discovery status and permitting issues
Hay, Daniel J.	6/2/2021	1.70	Revise discovery letter to New Rochelle based on most recent communication
Hay, Daniel J.	6/2/2021	0.50	Review custodians and collected documents
Hay, Daniel J.	6/2/2021	0.30	Revise TRA subpoena
Hay, Daniel J.	6/2/2021	0.30	Revise responses to First Set of Interrogatories
			Attention to discovery matters, including call with G. Todd and D. Hay regarding permitting requirements, review letter to opposing counsel regarding discovery matters, and correspondence with C. Clinton regarding discovery research
Craig, Laura K.	6/2/2021	1.00	
Todd, Gordon D.	6/2/2021	2.20	Review and revise draft letter to City regarding discovery issues
			Attention to discovery matters, including call with D. Hay regarding document discovery and correspondence with Lit Support regarding same
Craig, Laura K.	6/3/2021	0.30	
Hay, Daniel J.	6/4/2021	0.20	Call with L. Mulherin and A. Gonzalez regarding custodian issues
Hay, Daniel J.	6/4/2021	0.70	Review documents for production
Hay, Daniel J.	6/4/2021	0.80	Revise interrogatories
			Attention to discovery matters, including finalizing subpoena, call with D. Hay and A. Gonzalez regarding ESI productions
Craig, Laura K.	6/4/2021	1.20	
Hay, Daniel J.	6/5/2021	0.50	Review documents for production
Hay, Daniel J.	6/6/2021	0.60	Write submission for status conference
Hay, Daniel J.	6/7/2021	0.30	Call with C. Clinton, E. Estrada, and L. Mulherin to discuss financial data
Hay, Daniel J.	6/7/2021	0.40	Research FOIL exemptions for confidential discovery
Hay, Daniel J.	6/7/2021	0.20	Finalize and serve interrogatory responses
Hay, Daniel J.	6/7/2021	0.40	Draft submission for status conference
Hay, Daniel J.	6/7/2021	0.50	Review documents collected for production
			Attention to discovery matters, including finalizing interrogatories, finalizing ESI production, service of TRA subpoena, and correspondence with D. Hay regarding same
Craig, Laura K.	6/7/2021	3.70	
Hay, Daniel J.	6/8/2021	0.50	Meet and confer with defense counsel and follow up call with L. Mulherin
Hay, Daniel J.	6/8/2021	0.20	Call with L. Mulherin to prepare for meet and confer
Hay, Daniel J.	6/8/2021	0.60	Review and respond to discovery correspondence from opposing counsel
Hay, Daniel J.	6/8/2021	0.50	Review draft talking points for status conference
Hay, Daniel J.	6/8/2021	1.00	Review transcript of May status conference and prepare for June conference
			Attention to discovery matters, including drafting talking points for conference with Magistrate Judge, call with D. Hay and opposing counsel, and finalizing production of documents
Craig, Laura K.	6/8/2021	2.60	
Todd, Gordon D.	6/8/2021	0.50	Attention to discovery disputes with City including draft letter to court regarding continued deficiencies
Hay, Daniel J.	6/9/2021	1.00	Prepare for, attend, and debrief status conference
Hay, Daniel J.	6/9/2021	0.50	Review documents from C. Pujol collection
Craig, Laura K.	6/9/2021	2.40	Review of documents for production, and discussions with internal team regarding conference
Todd, Gordon D.	6/9/2021	0.20	Confer with D. Hay and L. Mulherin regarding discovery and open tasks
Craig, Laura K.	6/10/2021	1.30	Review documents regarding production
Hay, Daniel J.	6/11/2021	0.40	Review lease documents collected from market office
			Attention to discovery matters, including review of documents for production and call with D. Hay regarding same
Craig, Laura K.	6/14/2021	1.60	
Hay, Daniel J.	6/15/2021	1.20	Draft letter motion on RFA responses
Hay, Daniel J.	6/15/2021	0.50	Review and research deficiencies in New Rochelle's responses to interrogatories
			Attention to discovery matters, including review of lease files, update master permit table, and review and research regarding deficiencies in City's responses to Clear Channel's interrogatories
Craig, Laura K.	6/15/2021	2.40	
Hay, Daniel J.	6/16/2021	0.80	Revise motion to compel interrogatory responses
Craig, Laura K.	6/16/2021	0.70	Attention to discovery matters, including drafting letter regarding the City's interrogatory responses
Craig, Laura K.	6/17/2021	0.40	Draft letter regarding New Rochelle's responses to interrogatories
			Review and revise draft letter to MJ Krause regarding City's failure to answer requests for admission properly
Todd, Gordon D.	6/17/2021	0.60	
Hay, Daniel J.	6/18/2021	0.40	Revise motion to compel RFA responses
Craig, Laura K.	6/18/2021	2.30	Draft letter to New Rochelle regarding responses to interrogatories
Todd, Gordon D.	6/18/2021	0.20	Final review of letter to MJ Krause
Hay, Daniel J.	6/19/2021	1.40	Revise interrogatory deficiency letter prepared by L. Mulherin
Hay, Daniel J.	6/21/2021	0.90	Revise deficiency letter regarding New Rochelle's interrogatory responses

Hay, Daniel J.	6/21/2021	0.60	Finalize and serve motion to compel request for admission answers
Hay, Daniel J.	6/21/2021	0.70	Review additional lease file documentation collected by client
Craig, Laura K.	6/21/2021	2.50	Attention to discovery matters, including finalizing motion to compel, finalizing letter to defendants regarding interrogatories responses
Hay, Daniel J.	6/22/2021	0.70	Redact partially privileged documents
Craig, Laura K.	6/22/2021	1.90	Attention to discovery matters, including review of documents for production
Hay, Daniel J.	6/23/2021	0.30	Redact partially privileged documents
Craig, Laura K.	6/23/2021	2.00	Attention to discovery matters, including review of documents for production
Todd, Gordon D.	6/23/2021	0.70	Review new takings jurisprudence for relevance to substantive takings argument
Hay, Daniel J.	6/24/2021	1.90	Review lease files collected for supplemental production
Craig, Laura K.	6/24/2021	0.40	Review documents for production
Hay, Daniel J.	6/25/2021	1.00	Redact partially privileged documents
Craig, Laura K.	6/28/2021	2.10	Attention to discovery matters, including review of documents and relevant takings case law
Todd, Gordon D.	6/28/2021	0.30	Review correspondence from City to magistrate regarding CCO discovery objections
Rody, David M.	6/28/2021	0.20	Review opposition letter filed by City
Hay, Daniel J.	6/29/2021	0.40	Prepare for meet and confer with New Rochelle
Hay, Daniel J.	6/29/2021	0.70	Meet and confer with New Rochelle and follow up call with L. Mulherin
Hay, Daniel J.	6/29/2021	0.40	Draft reply to New Rochelle's RFA letter
Craig, Laura K.	6/29/2021	3.20	Attention to discovery matters, including calls with D. Hay, meet and confer with opposing counsel, and review of documents for production
Craig, Laura K.	6/30/2021	4.40	Attention to discovery matters, including review of documents for production
Todd, Gordon D.	6/30/2021	0.40	Review hot documents produced by City
Craig, Laura K.	7/1/2021	2.30	Attention to discovery matters, including review of documents for production and drafting summary of key documents produced by New Rochelle
Todd, Gordon D.	7/1/2021	0.30	Attention to document production and ongoing discovery dispute with City
Craig, Laura K.	7/2/2021	0.40	Attention to discovery matters, including finalizing production
Rody, David M.	7/2/2021	0.30	Correspondence with Sidley team, parties, and court re: court conference
Hay, Daniel J.	7/5/2021	0.40	Research waiver of numerosity objection to interrogatories
Craig, Laura K.	7/5/2021	1.50	Attention to discovery matters, including review of documents for production and draft talking points for conference with magistrate judge
Hay, Daniel J.	7/6/2021	4.40	Prepare for oral argument on motion to compel responses to requests for admission and revise L. Mulherin's talking points on discovery status
Craig, Laura K.	7/6/2021	6.80	Attention to discovery matters, including drafting talking points for conference with Magistrate judge, calls with D. Hay regarding discovery issues, and review documents for production
Todd, Gordon D.	7/6/2021	0.80	Review correspondence with City regarding revisions to interrogatories and confer with D. Hay regarding same
Rody, David M.	7/6/2021	0.50	Review filed letters and talking points for court conference on motion to compel discovery
Rody, David M.	7/6/2021	0.30	Correspondence with Sidley team re: preparations for court conference
Hay, Daniel J.	7/7/2021	1.30	Review and draft response to New Rochelle's proposal to amend interrogatories
Hay, Daniel J.	7/7/2021	4.50	Prepare for, attend, and debrief motion to compel argument
Craig, Laura K.	7/7/2021	3.70	Attention to discovery matters, including review of documents for production and draft revisions to Requests for Admission
Todd, Gordon D.	7/7/2021	0.20	Confer with D. Hay regarding hearing on discovery dispute
Rody, David M.	7/7/2021	0.30	Correspondence and conferences with Sidley team re: discovery conference
Hay, Daniel J.	7/8/2021	0.60	Review newly produced New Rochelle documents
Hay, Daniel J.	7/8/2021	1.20	Draft supplemental First Set of Interrogatories
Hay, Daniel J.	7/8/2021	0.70	Revise and send letter to New Rochelle regarding interrogatories
Craig, Laura K.	7/9/2021	0.70	Attention to permit matters, including call with G. Todd, D. Hay, and S. Llach and post-call with D. Hay
Hay, Daniel J.	7/12/2021	0.50	Revise requests for admission based on transcript of status conference
Craig, Laura K.	7/12/2021	4.90	Attention to discovery matters, including research regarding complaint, review of documents for production, revise Requests for Admission, and review hearing transcript
Rody, David M.	7/12/2021	0.20	Correspondence with Sidley team and City Counsel re: revised RFAs
Hay, Daniel J.	7/13/2021	0.40	Call with L. Mulherin regarding document review and productions
Hay, Daniel J.	7/13/2021	0.50	Review documents identified for further review in upcoming production
Hay, Daniel J.	7/13/2021	0.30	Revise amended requests for admission
Craig, Laura K.	7/13/2021	6.40	Attention to discovery matters, including review of documents for production, call with D. Hay regarding production, correspondence with opposing counsel regarding production, revise Requests for Admission
Rody, David M.	7/13/2021	0.70	Review and comment on revised RFA's
Hay, Daniel J.	7/14/2021	0.50	Correspondence with G. Todd regarding discovery and document productions
Hay, Daniel J.	7/14/2021	0.50	Correspond with S. Llach and C. Pujol re revenue data
Hay, Daniel J.	7/14/2021	0.50	Research rule limiting number of interrogatories
Craig, Laura K.	7/14/2021	3.00	Attention to discovery matters, including finalizing production and correspondence with opposing counsel regarding TRA production, review of TRA production
Todd, Gordon D.	7/14/2021	0.30	Strategize regarding dispute over number of rogs with respect to inquiring into affirmative defenses
Todd, Gordon D.	7/14/2021	0.40	Review key documents from final document production
Hay, Daniel J.	7/15/2021	0.40	Review financial data from C. Pujol
Craig, Laura K.	7/15/2021	1.70	Attention to discovery matters, including correspondence with opposing counsel regarding TRA documents, draft privilege log entries, finalize and send production, and research regarding confidentiality redactions
Hay, Daniel J.	7/16/2021	0.30	Review privileged documents for redaction
Hay, Daniel J.	7/16/2021	0.40	Review additional financial data from C. Pujol
Hay, Daniel J.	7/17/2021	3.50	Review privileged documents for redaction
Hay, Daniel J.	7/17/2021	0.40	Revise third-party discovery to Outfront Media and M. Schwartz
Hay, Daniel J.	7/17/2021	1.20	Draft supplemental responses to New Rochelle's first set of interrogatories
Hay, Daniel J.	7/18/2021	0.50	Review of privileged documents

Craig, Laura K.	7/18/2021	0.30	Correspondence regarding privilege log and discovery matters with D. Hay
Craig, Laura K.	7/19/2021	0.90	Attention to discovery, including drafting privilege log entries, review of RFPs, and review of TRA production
Craig, Laura K.	7/21/2021	0.50	Attention to discovery matters, including redact documents for production
Craig, Laura K.	7/22/2021	0.60	Attention to discovery matters, including review of privilege documents
Hay, Daniel J.	7/23/2021	0.30	Review and comment on L. Mulherin's draft summary of OFM bid
Hay, Daniel J.	7/23/2021	0.20	Call with B. Katz regarding Outfront Media discovery
Craig, Laura K.	7/23/2021	0.80	Draft summary of OFM RFP response
Craig, Laura K.	7/23/2021	2.40	Attention to discovery matters, including review of permit-related matters, correspondence with G. Todd regarding same, and review of privilege documents
Todd, Gordon D.	7/23/2021	0.30	Attention to pending settlement discussions including scheduling and summary of OFM deal terms for S. Llach
Craig, Laura K.	7/25/2021	0.50	Attention to production matters, including QC of document production
Craig, Laura K.	7/26/2021	2.50	Attention to discovery matters, including QC of production
Hay, Daniel J.	7/27/2021	1.00	Draft email to New Rochelle regarding state of document discovery
Craig, Laura K.	7/27/2021	1.40	Attention to discovery matters, including QC of production and draft production cover letter
Hay, Daniel J.	7/28/2021	0.70	Quality control review of privileged documents in final production
Craig, Laura K.	7/28/2021	0.30	Attention to discovery matters, including finalizing production
Craig, Laura K.	7/28/2021	0.10	Prepare production cover letter
Todd, Gordon D.	7/28/2021	2.50	Prepare for and participate in settlement discussion with City and OFM outside counsel
Todd, Gordon D.	7/28/2021	0.40	Call with S. Llach regarding settlement meeting
Hay, Daniel J.	7/29/2021	0.20	Send seventh production to New Rochelle
Todd, Gordon D.	7/29/2021	0.50	Attention to discovery issues including production and City deficiencies
Hay, Daniel J.	8/2/2021	0.50	Draft request for extension of deadlines
Craig, Laura K.	8/2/2021	2.20	Attention to discovery matters, including drafting privilege log entries
Hay, Daniel J.	8/3/2021	0.20	Revise request for two-month extension of case deadlines
Craig, Laura K.	8/3/2021	0.10	Review defendants amended RFAs
Todd, Gordon D.	8/3/2021	0.40	Attention to City's discovery deficiencies and strategize regarding motion for extension and/or to compel
Hay, Daniel J.	8/4/2021	0.30	Draft second set of interrogatories
Hay, Daniel J.	8/4/2021	0.50	Review New Rochelle's amended RFA responses
Hay, Daniel J.	8/4/2021	0.20	Revise letter motion for two-month extension
Craig, Laura K.	8/4/2021	0.80	Attention to discovery matters, including revisions to letter motion to court regarding extension of time
Todd, Gordon D.	8/4/2021	0.30	Review and revise draft correspondence to Magistrate re extending schedule
Craig, Laura K.	8/5/2021	1.30	Draft revised motion to court regarding extension of time, including call with D. Hay regarding same
Todd, Gordon D.	8/5/2021	0.30	Attention to motion to extend discovery schedule
Craig, Laura K.	8/9/2021	0.80	Attention to discovery matters, including drafting privilege log entries
Craig, Laura K.	8/10/2021	3.50	Attention to discovery matters, including drafting privilege log entries, call with D. Hay regarding discovery, and review of defendants' revised interrogatory responses
Hay, Daniel J.	8/11/2021	0.50	Review and draft deficiency letter regarding New Rochelle's amended interrogatory responses
Hay, Daniel J.	8/11/2021	0.20	Revise FOIL request based on review of New Rochelle RFP
Craig, Laura K.	8/11/2021	1.80	Attention to discovery matters, including drafting privilege log entries and QC of said entries
Craig, Laura K.	8/11/2021	0.50	Draft FOIL request to City of New Rochelle
Hay, Daniel J.	8/12/2021	0.60	Review and draft deficiency letter regarding New Rochelle's amended interrogatory responses
Craig, Laura K.	8/12/2021	1.30	Attention to discovery matters, including drafting third RFPs, research regarding subpoena compliance, privilege log QC, and research regarding billboard zoning
Hay, Daniel J.	8/16/2021	0.50	Draft update of discovery status and outstanding items for G. Todd
Hay, Daniel J.	8/16/2021	0.40	Review L. Mulherin's questions regarding priv log QC
Craig, Laura K.	8/16/2021	2.90	Attention to discovery matters, including conducting legal research regarding contention interrogatories and deposition limits, revision of email to G. Todd related to status of discovery, and finalizing privilege log, and drafting list of potential deponents
Craig, Laura K.	8/18/2021	0.70	Attention to discovery matters, including review of privilege log entries
Todd, Gordon D.	8/18/2021	0.80	Prepare for, participate in, and report on settlement discussion with City and OFM counsel
Hay, Daniel J.	8/19/2021	0.40	Review and comment on draft privilege log
Craig, Laura K.	8/19/2021	0.70	Research regarding contention interrogatories and other discovery matters
Craig, Laura K.	8/19/2021	5.60	Attention to discovery matters, including review of Thruway bills and revisions to privilege log export
Hay, Daniel J.	8/20/2021	0.30	Call with G. Todd and L. Mulherin regarding discovery status
Hay, Daniel J.	8/20/2021	1.00	Call with L. Mulherin regarding privilege log and discovery status
Hay, Daniel J.	8/20/2021	0.30	Call with J. Nonkes regarding outstanding discovery items
Craig, Laura K.	8/20/2021	0.30	Call with G. Todd and D. Hay regarding case management matters
Craig, Laura K.	8/20/2021	3.60	Attention to discovery matters, including review and QC of privilege log, review of 3rd set of RFPs, and calls with D. Hay regarding same
Todd, Gordon D.	8/20/2021	0.50	Call with D. Hay and L. Mulherin regarding open discovery and strategy items
Craig, Laura K.	8/22/2021	0.10	Finalize third set of RFPs
Hay, Daniel J.	8/23/2021	1.10	Call with client to discuss settlement proposals from City and OFM
Craig, Laura K.	8/23/2021	0.10	Finalize and send third request for production
Todd, Gordon D.	8/23/2021	1.00	Call with client and market regarding settlement options
Craig, Laura K.	8/24/2021	0.80	Attention to discovery matters, including research regarding OFM obligations under master license, research regarding motion to compel, and drafting motion to compel
Hay, Daniel J.	8/25/2021	1.50	Revise draft motion to compel prepared by L. Mulherin
Craig, Laura K.	8/25/2021	1.10	Attention to discovery matters, including correspondence with New Rochelle and revisions to privilege log
Craig, Laura K.	8/26/2021	1.40	Review and revise privilege log
Ballard, Emma A.	8/26/2021	1.00	Assist L. Mulherin and D. Hay with privilege log
Hay, Daniel J.	8/27/2021	0.40	Review and draft response to NR discovery letter

Craig, Laura K.	8/27/2021	1.30	Review and revise privilege log
Ballard, Emma A.	8/27/2021	0.50	Assist L. Mulherin and D. Hay with privilege log
Hay, Daniel J.	8/28/2021	0.40	Draft response to J. Nonkes on outstanding discovery matters
Hay, Daniel J.	8/29/2021	0.30	Draft response to J. Nonkes on outstanding discovery matters
Craig, Laura K.	8/29/2021	0.10	Review draft correspondence to City of New Rochelle
Hay, Daniel J.	8/30/2021	1.10	Review and comment on draft privilege log
Craig, Laura K.	8/30/2021	0.80	Attention to discover matters, including revisions to response to City's letter and review of City's production
Hay, Daniel J.	8/31/2021	0.70	Attention to discovery matters, including revisions to privilege log, call with D. Hay, and revisions to draft letter to City
Todd, Gordon D.	8/31/2021	0.20	Review and revise draft discovery correspondence with City
Craig, Laura K.	9/3/2021	0.40	Correspondence with opposing counsel regarding meet and confer
Craig, Laura K.	9/6/2021	0.20	Attention to discovery issues, including call with D. Hay regarding meet and confer with opposing counsel and correspondence with opposing counsel regarding same
Hay, Daniel J.	9/7/2021	0.20	Prepare for meet and confer with New Rochelle
Hay, Daniel J.	9/7/2021	0.80	Meet and confer with New Rochelle and follow up with G. Todd and L. Mulherin re outstanding discovery issues
Craig, Laura K.	9/7/2021	1.10	Attention to discovery matters, including preparation for and attending meet and confer
Todd, Gordon D.	9/7/2021	0.30	Prepare for meet and confer on discovery issues
Todd, Gordon D.	9/7/2021	0.20	Call with City lawyer regarding CCO/OFM settlement discussions
Todd, Gordon D.	9/7/2021	1.00	Meet and confer with City regarding open discovery issues
Todd, Gordon D.	9/7/2021	0.30	Call with OFM counsel regarding settlement discussions
Todd, Gordon D.	9/7/2021	0.40	Draft confidentiality agreement for CCO/OFM settlement discussions
Hay, Daniel J.	9/8/2021	0.40	Revise talking points for status conference
Hay, Daniel J.	9/8/2021	0.60	Draft response to discovery email from J. Nonkes
Craig, Laura K.	9/8/2021	2.20	Attention to discovery matters, including drafting talking points for status conference, call with D. Hay regarding correspondence from opposing counsel, and research regarding response to opposing counsel's email
Hay, Daniel J.	9/9/2021	0.90	Prepare for, attend, and debrief status conference
Craig, Laura K.	9/9/2021	0.50	Draft summary regarding discovery conference and update to G. Todd regarding production issues
Todd, Gordon D.	9/9/2021	0.30	Confer with D. Hay and L. Mulherin regarding case timing and strategy
Rody, David M.	9/9/2021	0.20	Correspondence and conferences with Sidley team re: discovery strategy
Craig, Laura K.	9/13/2021	0.20	Attention to preparing privilege log
Craig, Laura K.	9/14/2021	0.30	Attention to discovery matters, including discussion of discovery plan with D. Hay
Craig, Laura K.	9/15/2021	0.80	Draft deposition and end of discovery work plan
Hay, Daniel J.	9/16/2021	0.40	Review and comment on revisions by L. Mulherin to discovery plan
Hay, Daniel J.	9/16/2021	1.00	Draft list of potential deponents
Craig, Laura K.	9/16/2021	1.90	Attention to discovery matters, including drafting discovery plan and deposition plan
Hay, Daniel J.	9/17/2021	0.40	Draft email to opposing counsel re initial disclosures and deposition limit
Craig, Laura K.	9/20/2021	0.80	Draft letter to court regarding outstanding discovery matters
Craig, Laura K.	9/21/2021	0.30	Attention to discovery matters, including correspondence with opposing counsel regarding meet and confer
Todd, Gordon D.	9/21/2021	0.20	Review privilege log
Todd, Gordon D.	9/21/2021	0.20	Correspondence re meet and confer in advance of MJ conference
Hay, Daniel J.	9/23/2021	0.40	Call with L. Mulherin re issues for meet and confer with New Rochelle
Hay, Daniel J.	9/23/2021	0.60	Prepare talking points for meet and confer
Hay, Daniel J.	9/23/2021	0.30	Revise agenda for meet and confer with New Rochelle
Hay, Daniel J.	9/23/2021	1.20	Review documents produced by New Rochelle
Craig, Laura K.	9/23/2021	1.80	Attention to discovery matters, including drafting agenda for meet and confer, revising talking points for meet and confer, and call with D. Hay regarding same
Hay, Daniel J.	9/24/2021	0.70	Meet and confer with New Rochelle
Craig, Laura K.	9/24/2021	1.80	Attention to discovery matters, including attending meet and confer with opposing counsel, review of defendants' new production, and call with D. Hay regarding same
Hay, Daniel J.	9/27/2021	0.50	Review amended discovery responses collected for service
Hay, Daniel J.	9/27/2021	0.80	Revise letter to magistrate re discovery issues
Hay, Daniel J.	9/27/2021	0.30	Review amended interrogatory responses
Craig, Laura K.	9/27/2021	2.40	Attention to discovery matters, including drafting deposition notices, reviewing defendants' productions for completeness, and drafting letter to Court regarding discovery status
Hay, Daniel J.	9/28/2021	0.30	Revise and file discovery letter
Hay, Daniel J.	9/28/2021	1.40	Research response to New Rochelle's discovery letter
Craig, Laura K.	9/28/2021	1.80	Attention to discovery matters, including finalizing filing regarding discovery status, finalizing drafts of discovery requests, and call with D. Hay regarding same
Todd, Gordon D.	9/28/2021	0.40	response
Todd, Gordon D.	9/28/2021	0.50	Review and revise draft privilege log, amended discovery responses and disclosures, and correspondence to City re same
Hay, Daniel J.	9/29/2021	0.60	Research response to New Rochelle's discovery letter
Hay, Daniel J.	9/29/2021	1.00	Draft response to New Rochelle's discovery letter
Craig, Laura K.	9/29/2021	0.10	Review draft response letter to Magistrate Krause
Craig, Laura K.	9/30/2021	0.40	Attention to discovery matters, including finalizing upcoming discovery filings
Hay, Daniel J.	10/1/2021	1.40	Draft response to New Rochelle's discovery letter
Craig, Laura K.	10/1/2021	1.80	Attention to discovery matters, including drafting letter to M.J. Krause regarding discovery dispute, call with D. Hay regarding same
Hay, Daniel J.	10/3/2021	0.80	Review and identify documents for use in spoliation letter
Craig, Laura K.	10/3/2021	0.80	Attention to discovery matters, including drafting RFPs
Hay, Daniel J.	10/4/2021	0.50	Revise response to New Rochelle's discovery letter

Hay, Daniel J.	10/4/2021	0.90	Draft schedule to TRA 30(b)(6) deposition
Hay, Daniel J.	10/4/2021	0.90	Review and comment on revisions to privilege log
Craig, Laura K.	10/4/2021	2.40	Attention to discovery matters, including finalizing discovery filings (e.g., privilege log, interrogatories, initial disclosures)
Rody, David M.	10/4/2021	0.20	Conferences and correspondence re: planning for discovery hearing in White Plains District court
Hay, Daniel J.	10/5/2021	1.40	Revise, finalize, and serve response to discovery letter for filing
Hay, Daniel J.	10/5/2021	0.50	Calls with G. Todd and L. Mulherin re filing and service of discovery matters this evening
Hay, Daniel J.	10/5/2021	0.80	Identify duplicates in New Rochelle's productions
Hay, Daniel J.	10/5/2021	0.50	Prepare for discovery argument
Craig, Laura K.	10/5/2021	3.50	Attention to discovery matters, including finalizing outgoing discovery, finalizing letter to Magistrate Krause, drafting talking points for conference, and calls with D. Hay regarding same
Todd, Gordon D.	10/5/2021	0.60	Review and revision of letter to MJ Krause responding to City's spoliation claims
Todd, Gordon D.	10/5/2021	0.40	Attention to discovery of email files of former custodians
Todd, Gordon D.	10/5/2021	0.40	Review and comment on City's rebuttal letter
Hay, Daniel J.	10/6/2021	1.60	Prepare for discovery argument
Craig, Laura K.	10/6/2021	0.70	Attention to discovery matters, including drafting TRA subpoena and correspondence with opposing counsel
Rody, David M.	10/6/2021	0.50	Correspondence with Sidley team and opponent re: preparations and arguments for upcoming hearing
Hay, Daniel J.	10/7/2021	1.30	Prepare for discovery argument
Hay, Daniel J.	10/7/2021	0.40	Revise subpoena to TRA
Hay, Daniel J.	10/7/2021	3.70	Prepare for argument
Craig, Laura K.	10/7/2021	2.40	Attention to discovery matters, including preparation for conference
Rody, David M.	10/7/2021	1.00	Review parties' filings and talking points for arguments at hearing
Rody, David M.	10/7/2021	1.00	Preparations for in-court hearing, and conferences and correspondence with Sidley team re: same
Hay, Daniel J.	10/8/2021	2.00	Prepare for, attend, and debrief status conference argument
Hay, Daniel J.	10/8/2021	0.30	Draft summary of status conference
Hay, Daniel J.	10/8/2021	0.60	Draft deficiency letter
Rody, David M.	10/8/2021	0.50	Conferences and correspondence with Sidley team and client re: court conference
Hay, Daniel J.	10/9/2021	0.80	Draft deficiency letter
Craig, Laura K.	10/10/2021	2.70	Attention to discovery matters, including analyzing Defendants' productions for completeness
Hay, Daniel J.	10/11/2021	2.40	Draft deficiency letter
Hay, Daniel J.	10/11/2021	0.40	Review supplemental collection from additional custodians
Craig, Laura K.	10/11/2021	2.00	Attention to discovery matters, including revisions to deficiency letter and documents from IHM
Todd, Gordon D.	10/11/2021	0.20	Correspondence with OFM counsel regarding renewed settlement discussions
Todd, Gordon D.	10/11/2021	0.30	Review draft 30(b)(6) notice for TRA
Todd, Gordon D.	10/11/2021	0.30	Review and revise proposed list of potential deponents
Hay, Daniel J.	10/12/2021	0.80	Revise and serve deficiency letter
Craig, Laura K.	10/12/2021	0.20	Attention to discovery matters, including correspondence regarding permits and transcript
Todd, Gordon D.	10/12/2021	0.40	Finalize list of potential deponents and communicate same to S. Llach for review and comment
Todd, Gordon D.	10/12/2021	0.60	Review and revise discovery deficiency letter to City
Rody, David M.	10/12/2021	0.50	Review discovery letter to city's counsel; correspondence with Sidley team re: same
Rody, David M.	10/13/2021	0.40	Correspondence with Sidley team re: progress of discovery disputes and OFM counter-offer
Hay, Daniel J.	10/14/2021	0.30	Review documents and discovery to prepare for meet and confer
Hay, Daniel J.	10/15/2021	3.30	Review and draft summary of sign files for I-95 signs
Hay, Daniel J.	10/15/2021	1.50	Meet and confer with New Rochelle and follow up with Sidley team
Craig, Laura K.	10/15/2021	1.60	Attention to discovery matters, including attending meet and confer with opposing counsel and internal post-call
Todd, Gordon D.	10/15/2021	0.80	Attention to discovery disputes with City including search terms, under-production, missing privilege log, and other deficiencies
Rody, David M.	10/15/2021	0.80	Conferences and correspondence with Sidley team re: call with City's counsel and strategy going forward
Rody, David M.	10/15/2021	1.20	Prepare for and attend call with opposing counsel and Sidley team re: meet and confer over discovery disputes
Hay, Daniel J.	10/16/2021	1.40	Review Coughlan/Mayer documents
Hay, Daniel J.	10/16/2021	0.60	Draft letter requesting pre-motion letter conference
Hay, Daniel J.	10/17/2021	0.50	Review of Coughlan and Mayer documents
Craig, Laura K.	10/17/2021	0.40	Draft letter motion for a continuance and amended civil case discovery schedule
Craig, Laura K.	10/18/2021	0.40	Attention to discovery matters, including call with opposing counsel regarding City records and finalizing letter motion to Court
Todd, Gordon D.	10/18/2021	0.30	Attention to correspondence with court regarding status of discovery
Craig, Laura K.	10/19/2021	0.60	Attention to discovery matters, including finalizing letter motion and attending call with client regarding permits
Hay, Daniel J.	10/20/2021	0.90	Review Coughlan and Mayer documents
Craig, Laura K.	10/20/2021	0.10	Correspondence regarding discovery matters
Hay, Daniel J.	10/21/2021	1.20	Draft email to New Rochelle on outstanding discovery matters and case schedule
Craig, Laura K.	10/21/2021	1.00	Attention to discovery matters, including review of documents for production
Hay, Daniel J.	10/22/2021	3.20	Review of Coughlan and Mayer documents
Hay, Daniel J.	10/22/2021	0.50	Prepare outline for interview of I. Shepherd
Rody, David M.	10/22/2021	0.50	Correspondence with Sidley team re: revised scheduling order and strategy for addressing undisputed facts
Hay, Daniel J.	10/23/2021	1.70	Draft letter to court re Defendants' discovery deficiencies
Hay, Daniel J.	10/23/2021	1.20	Review Coughlan and Mayer documents
Craig, Laura K.	10/24/2021	0.40	Attention to preparing documents for production
Hay, Daniel J.	10/25/2021	0.60	Call with L. Mulherin re supplemental document production

Hay, Daniel J.	10/25/2021	0.70	Call with L. Mulherin and L. Bonacorsi re fact development
Craig, Laura K.	10/25/2021	2.30	Attention to discovery matters, including review of documents for production, call with D. Hay regarding document production, and call with D. Hay and L. Bonacorsi regarding discovery tasks
Bonacorsi, Lauri A.	10/25/2021	0.80	Review assignment to make chronology of facts with L. Mulherin and D. Hay, in preparation for depositions and subsequent stages of case
Bonacorsi, Lauri A.	10/25/2021	2.00	Read complaint and preliminary injunction motion in anticipation of meeting with L. Mulherin and D. Hay
Ballard, Emma A.	10/25/2021	2.30	Assist D. Hay and L. Mulherin with creating summary of the New Rochelle City Council's discussion about billboards
Hay, Daniel J.	10/26/2021	0.60	Review documents relating to sunset date
Craig, Laura K.	10/26/2021	3.80	Attention to discovery matters, including QC of documents for production and call with D. Hay regarding same
Bonacorsi, Lauri A.	10/26/2021	4.80	Incorporate new documents into case chronology
Todd, Gordon D.	10/26/2021	0.20	Correspondence with OFM counsel regarding possible settlement meeting
Rody, David M.	10/26/2021	0.20	Correspondence with Sidley team re: discovery schedule
Hay, Daniel J.	10/27/2021	0.80	Final review of proposed production
Hay, Daniel J.	10/27/2021	0.30	Call with L. Mulherin re supplemental production
Craig, Laura K.	10/27/2021	1.50	Attention to discovery matters, including finalizing filing, finalizing production, and call with D. Hay regarding same
Bonacorsi, Lauri A.	10/27/2021	3.50	Add additional documents and their summaries to case chronology
Rody, David M.	10/27/2021	0.20	Review filing of amended discovery plan and scheduling order
Craig, Laura K.	10/28/2021	0.80	Attention to discovery matters, including call with L. Bonacorsi regarding deposition preparation assignment
Bonacorsi, Lauri A.	10/28/2021	0.30	Meet with L. Mulherin to discuss document review assignment and using Relativity
Bonacorsi, Lauri A.	10/28/2021	0.20	Prepare questions for meeting with L. Mulherin to discuss document review assignment
Bonacorsi, Lauri A.	10/28/2021	1.20	Add new documents to case chronology
Hay, Daniel J.	10/29/2021	0.60	Prepare supplemental production
Hay, Daniel J.	10/29/2021	0.20	Finalize and send supplemental production
Hay, Daniel J.	10/29/2021	0.50	Revise discovery letter to the court
Bonacorsi, Lauri A.	10/29/2021	0.50	Review complaint to prepare to conduct document review of New Rochelle's production
Rody, David M.	10/29/2021	0.20	Correspondence with opponent re: discovery production and schedule
Bonacorsi, Lauri A.	11/1/2021	1.60	Review remainder of complaint to obtain factual and legal background needed to conduct document review of New Rochelle's production
Bonacorsi, Lauri A.	11/1/2021	4.30	Conduct document review of New Rochelle's production in anticipation of depositions
Hay, Daniel J.	11/2/2021	0.70	Revise status conference submission
Bonacorsi, Lauri A.	11/2/2021	6.50	Conduct document review of New Rochelle production in anticipation of depositions
Rody, David M.	11/2/2021	0.50	Review and comment on discovery letter
Rody, David M.	11/2/2021	1.00	Conferences and correspondence with Sidley team re: discovery letter and strategy
Hay, Daniel J.	11/3/2021	0.80	Revise status conference submission based on supplemental information from Defendants
Bonacorsi, Lauri A.	11/3/2021	5.30	Conduct document review of New Rochelle production in anticipation of depositions
Bonacorsi, Lauri A.	11/3/2021	0.50	Proofread and provide substantive edits to pre-conference letter to Magistrate Judge Krause
Bonacorsi, Lauri A.	11/3/2021	1.00	Proofread and provide substantive edits to pre-conference letter to Magistrate Judge Krause
Todd, Gordon D.	11/3/2021	0.30	Review and revise draft letter to magistrate regarding discovery status
Rody, David M.	11/3/2021	0.40	Correspondence with Sidley team re: letter to court and discovery strategy
Rody, David M.	11/3/2021	0.40	Review and revise letter to court on discovery disputes
Bonacorsi, Lauri A.	11/4/2021	0.90	Conduct document review of New Rochelle production in anticipation of depositions
Rody, David M.	11/4/2021	0.20	Review letter filed by Harris Beach for conference
Rody, David M.	11/4/2021	0.20	Conferences and correspondence with Sidley team re: Harris Beach letter
Hay, Daniel J.	11/5/2021	1.80	Prepare talking points for November 8 status conference
Bonacorsi, Lauri A.	11/5/2021	0.20	Review emails from D. Hay re: status conference talking points
Bonacorsi, Lauri A.	11/5/2021	3.80	Conduct document review of New Rochelle's production in anticipation of depositions
Rody, David M.	11/5/2021	0.20	Correspondence with Sidley team re: strategy for court conference
Bonacorsi, Lauri A.	11/6/2021	5.70	Conduct document review of New Rochelle's production in anticipation of depositions
Rody, David M.	11/6/2021	0.50	Review and comment on draft talking points for upcoming hearing
Rody, David M.	11/6/2021	0.20	Correspondence with Sidley team re: talking points
Hay, Daniel J.	11/7/2021	0.60	Call with D. Rody re discovery argument
Hay, Daniel J.	11/7/2021	2.70	Prepare for discovery argument
Craig, Laura K.	11/7/2021	0.80	Draft summary of New Rochelle productions
Bonacorsi, Lauri A.	11/7/2021	0.70	Research FOIL question regarding local government record retention requirements for D. Hay in anticipation of status conference
Bonacorsi, Lauri A.	11/7/2021	3.00	Prepare document review summary for New Rochelle production
Todd, Gordon D.	11/7/2021	0.30	Prepare for conference with magistrate
Rody, David M.	11/7/2021	1.00	Review and comment on talking points and court letters to prepare for conference
Rody, David M.	11/7/2021	0.80	Conferences and correspondence with Sidley team re: strategy for conference
Hay, Daniel J.	11/8/2021	3.50	Prepare for, attend, and debrief status conference
Bonacorsi, Lauri A.	11/8/2021	4.70	Update tagging on document review platform for New Rochelle's production based on input from L. Mulherin
Bonacorsi, Lauri A.	11/8/2021	0.90	Research follow-up FOIL question regarding local government record retention requirements for D. Hay in anticipation of status conference
Bonacorsi, Lauri A.	11/8/2021	0.20	Correspondence with L. Mulherin regarding updating tagging conventions in document review platform
Hay, Daniel J.	11/9/2021	0.50	Review and update deposition plan based on produced documents
Craig, Laura K.	11/9/2021	1.10	Attention to discovery matters, including correspondence with opposing counsel regarding privilege log and review of draft case chronology
Bonacorsi, Lauri A.	11/9/2021	1.10	Conduct first level review of New Rochelle's document productions to assist with the deposition preparation

Bonacorsi, Lauri A.	11/9/2021	0.30	Report to L. Mulherin and D. Hay the latest findings from second iteration of review of New Rochelle's production
Bonacorsi, Lauri A.	11/9/2021	1.90	Organize Master Chronology for D. Rody to review
Bonacorsi, Lauri A.	11/9/2021	1.30	Compile e-binder of documents in Master Chronology for D. Rody to review
Bonacorsi, Lauri A.	11/9/2021	0.50	Conduct first level review of New Rochelle's 2021.11.05 production to understand key themes
Rody, David M.	11/9/2021	1.70	Review case document chronology
Rody, David M.	11/9/2021	0.20	Correspondence with Sidley team re: document chronology
Hay, Daniel J.	11/10/2021	0.70	Update correspondence relating to partial summary judgment motion
Hay, Daniel J.	11/10/2021	0.40	Revise deposition plan
Hay, Daniel J.	11/10/2021	0.30	Revise second set of interrogatories
Hay, Daniel J.	11/10/2021	1.20	Review L. Mulherin's research on permitting requirements and prepare summary email for client
			Attention to discovery work streams, including call with L. Bonacorsi regarding deposition preparation
Craig, Laura K.	11/10/2021	1.00	review and review of documents
			Attention to NY Thruway permitting research, including updating master permit table and drafting summary of permitting regulatory requirements
Bonacorsi, Lauri A.	11/10/2021	0.40	Correspondence with L. Mulherin re: significance of FOIL, Master License, RFP topics for document review
Bonacorsi, Lauri A.	11/10/2021	0.50	Consolidate notes of key relevant themes for subsequent stages of document review of New Rochelle's latest production
Bonacorsi, Lauri A.	11/10/2021	0.90	Review New Rochelle's 2021.11.05 production in anticipation of Depo Prep
Bonacorsi, Lauri A.	11/10/2021	1.10	Write L. Mulherin with sample of FOIL-related documents to decide significance
Bonacorsi, Lauri A.	11/10/2021	0.80	Call with L. Mulherin re: FOIL relevance to future stages of litigation
Bonacorsi, Lauri A.	11/10/2021	0.40	Review interrogatory assignment in anticipation of drafting second set of interrogatories
Bonacorsi, Lauri A.	11/10/2021	0.20	Review internal correspondence regarding potential partial summary judgment motion
			Review notes from call with L. Mulherin in anticipation of summarizing 2021.11.05 production by New Rochelle
Bonacorsi, Lauri A.	11/10/2021	0.10	Review interrogatory assignment in anticipation of drafting second set of interrogatories
Todd, Gordon D.	11/10/2021	0.20	Call with S. Llach regarding partial motion for summary judgment
Todd, Gordon D.	11/10/2021	0.30	Conferences with D. Rody and D. Hay regarding depositions and summary judgment motion
Rody, David M.	11/10/2021	1.20	Conferences and correspondence with Sidley team re: deposition planning and strategy
Rody, David M.	11/10/2021	0.50	Correspondence with Sidley team and adversary re: partial summary judgment and discovery
Hay, Daniel J.	11/11/2021	0.80	Meet with L. Mulherin and L. Boncarsi re case status and upcoming deadlines
Hay, Daniel J.	11/11/2021	0.50	Prepare outline of motion for summary judgment
			Attention to discovery matters, including preparing permit summary and review of key document summary
Craig, Laura K.	11/11/2021	2.50	
Bonacorsi, Lauri A.	11/11/2021	0.60	Prepare New Rochelle 2021.11.05 production for L. Mulherin
Bonacorsi, Lauri A.	11/11/2021	1.50	Review and draft summary of New Rochelle 2021.11.05 production
Bonacorsi, Lauri A.	11/11/2021	0.10	Correspondence with L. Mulherin re: second set of interrogatories
Bonacorsi, Lauri A.	11/11/2021	0.70	Draft summary for D. Hay regarding key documents flagged from New Rochelle production review
			Meet with D. Hay and L. Mulherin about partial summary judgment motion and implications for discovery
Bonacorsi, Lauri A.	11/11/2021	1.00	Draft next steps to share with L. Mulherin and D. Hay
Bonacorsi, Lauri A.	11/11/2021	0.10	Prepare to meet with D. Hay and L. Mulherin re: partial summary judgment motion
Bonacorsi, Lauri A.	11/11/2021	0.10	Initial review of SDNY local rules for summary judgment motion
Bonacorsi, Lauri A.	11/11/2021	0.40	Prepare summary of New Rochelle 2021.11.05 production for L. Mulherin
Rody, David M.	11/11/2021	2.00	Review case materials to prepare for depositions
Hay, Daniel J.	11/12/2021	0.20	Outline motion for summary judgment
Craig, Laura K.	11/12/2021	0.30	Attention to discovery matters, including review draft summary of key document review
Bonacorsi, Lauri A.	11/12/2021	3.50	Prepare summary of key documents for D. Hay from New Rochelle's production
Bonacorsi, Lauri A.	11/12/2021	0.60	Correspondence with L. Mulherin re: second set of interrogatories
Bonacorsi, Lauri A.	11/13/2021	2.70	Update Chronology based on new key documents
Bonacorsi, Lauri A.	11/13/2021	1.00	Research local rules in SDNY applicable to summary judgment
Craig, Laura K.	11/14/2021	0.10	Correspondence with L. Bonacorsi regarding research project
Bonacorsi, Lauri A.	11/14/2021	0.40	Incorporate D. Hay's proposed interrogatories into second set
Bonacorsi, Lauri A.	11/14/2021	1.30	Research individual judge rules for summary judgment motion
Bonacorsi, Lauri A.	11/14/2021	0.70	Prepare instructions and definitions for second set of interrogatories
Bonacorsi, Lauri A.	11/14/2021	0.70	Prepare summary of local rules for D. Hay and L. Mulherin
Hay, Daniel J.	11/15/2021	0.60	Review documents relating to I. Shepherd for use in interview
Hay, Daniel J.	11/15/2021	1.20	Outline motion for summary judgment and statement of undisputed material facts
			Attention to discovery work streams, including review of documents for production and meeting with L. Bonacorsi regarding key document review
Craig, Laura K.	11/15/2021	1.20	Finalize summary of local rules based on input from L. Mulherin in anticipation of summary judgment motion
Bonacorsi, Lauri A.	11/15/2021	1.20	Meet with L. Mulherin to discuss preparing binder for D. Hay with key documents from New Rochelle production
Bonacorsi, Lauri A.	11/15/2021	0.30	Prepare binder for D. Hay with key documents from New Rochelle production
Bonacorsi, Lauri A.	11/15/2021	1.60	Incorporate new interrogatory shared by D. Hay into draft
Bonacorsi, Lauri A.	11/15/2021	0.50	Review PI briefs in anticipation of drafting interrogatories
Bonacorsi, Lauri A.	11/15/2021	0.30	Review affidavits in anticipation of drafting interrogatories
Ballard, Emma A.	11/15/2021	1.00	Create binder of key documents for review for depositions
			Settlement discussions with OFM regarding New Rochelle litigation including call with OFM counsel, prep with S. Llach and market team, meeting with OFM counsel, and review pleadings, documents, and settlement materials in preparation for discussions
Todd, Gordon D.	11/15/2021	7.50	Review key case documents to prepare for depositions
Rody, David M.	11/15/2021	0.50	Correspond with L. Mulherin and L. Bonacorsi re summary judgment briefing
Hay, Daniel J.	11/16/2021	0.70	Call with D. Rody re deposition preparation

Hay, Daniel J.	11/16/2021	1.50	Review New Rochelle's privilege log
Hay, Daniel J.	11/16/2021	2.50	Research and draft correspondence re New Rochelle's privilege log
Craig, Laura K.	11/16/2021	2.20	Attention to discovery matters, including review of privilege log, drafting task tracker, and discussions with D. Hay regarding discovery issues
Bonacorsi, Lauri A.	11/16/2021	1.10	Review docket to gather key questions for interrogatories
Bonacorsi, Lauri A.	11/16/2021	2.40	Draft interrogatories
Bonacorsi, Lauri A.	11/16/2021	0.50	Edit introductory sections of interrogatories based on full draft
Bonacorsi, Lauri A.	11/16/2021	0.50	Correspondence with L. Mulherin re: interrogatories and next steps
Bonacorsi, Lauri A.	11/16/2021	0.50	Correspondence with D. Hay re: summary judgment drafting process
Bonacorsi, Lauri A.	11/16/2021	0.20	Correspondence with L. Mulherin and D. Hay re: next steps based on New Rochelle's deadline to submit additional information
Todd, Gordon D.	11/16/2021	0.60	Review and revise draft letter to Judge Roman regarding partial motion for summary judgment and circulate same to S. Llach for review
Rody, David M.	11/16/2021	1.00	Conferences and correspondence with Sidley team re: MSJ's strategy and logistics
Hay, Daniel J.	11/17/2021	1.20	Revise and send correspondence re privilege log based on comments from G. Todd
Hay, Daniel J.	11/17/2021	1.20	Research privilege log sanctions
Hay, Daniel J.	11/17/2021	0.20	Call with L. Mulherin re privilege log letter
Craig, Laura K.	11/17/2021	2.90	Attention to privilege log deficiency review, including review of log and revisions to deficiency letter
Craig, Laura K.	11/17/2021	0.30	Call with L. Bonacorsi regarding discovery work streams
Craig, Laura K.	11/17/2021	0.60	Draft second set of interrogatories to City of New Rochelle
Craig, Laura K.	11/17/2021	1.40	Attention to discovery matters, including revisions to interrogatories and preparation of deposition key document binder
Bonacorsi, Lauri A.	11/17/2021	0.20	Review correspondence with D. Hay and L. Mulherin re: next steps upon receiving New Rochelle production on 2021.11.16
Bonacorsi, Lauri A.	11/17/2021	0.40	Prepare for and meet with L. Mulherin regarding initial disclosures and binder for D. Rody on N. Bramson
Bonacorsi, Lauri A.	11/17/2021	0.20	Email litigation support to add panel to Relativity in anticipation of further document review
Bonacorsi, Lauri A.	11/17/2021	0.10	Email research services to conduct news search on N. Bramson in anticipation of deposition
Bonacorsi, Lauri A.	11/17/2021	0.60	Review research services output of news articles on N. Bramson in anticipation of deposition
Bonacorsi, Lauri A.	11/17/2021	3.80	Begin work on table of contents of binder to summarize documents for D. Rody relevant to N. Bramson
Bonacorsi, Lauri A.	11/17/2021	0.10	N. Bramson deposition preparation research
Bonacorsi, Lauri A.	11/17/2021	1.70	Conduct research for D. Hay related to metadata exports in privilege logs in anticipation for seeking sanctions
Bonacorsi, Lauri A.	11/17/2021	0.10	Review L. Mulherin's feedback on interrogatory draft
Todd, Gordon D.	11/17/2021	0.20	Attention to motion for partial summary judgment including correspondence with S. Llach and D. Hay re same
Todd, Gordon D.	11/17/2021	1.20	Review New Rochelle privilege log and review and revise correspondence to defendant regarding deficiencies
Rody, David M.	11/17/2021	0.30	Correspondence with Sidley team re: privilege log response letter
Rody, David M.	11/17/2021	0.40	Review, revise, and comment on privilege log response letter
Hay, Daniel J.	11/18/2021	0.30	Review documents collected for Bramson deposition
Hay, Daniel J.	11/18/2021	1.00	Identify documents for TRA deposition
Hay, Daniel J.	11/18/2021	2.50	Research and draft sanctions motion
Hay, Daniel J.	11/18/2021	0.20	Review and comment on draft second set of interrogatories
Craig, Laura K.	11/18/2021	1.00	Attention to discovery matters, including preparation of N. Bramson deposition preparation binder
Bonacorsi, Lauri A.	11/18/2021	2.10	Continue working on coordinating binder for D. Rody in anticipation of deposition of N. Bramson
Bonacorsi, Lauri A.	11/18/2021	4.40	Research for D. Hay related to sanctions based on deficient privilege logs
Bonacorsi, Lauri A.	11/18/2021	2.00	Incorporate final edits into interrogatory draft to send to D. Hay
Ballard, Emma A.	11/18/2021	1.10	Assist L. Mulherin with creating binder in preparation for depositions
Hay, Daniel J.	11/19/2021	1.10	Review and implement L. Bonacorsi's research on sanctions motion
Craig, Laura K.	11/19/2021	2.40	Attention to discovery matters, including preparation of supplemental privilege log
Bonacorsi, Lauri A.	11/19/2021	0.30	Incorporate D. Hay's edits to interrogatory draft to send to G. Todd
Bonacorsi, Lauri A.	11/19/2021	0.10	Correspondence with D. Rody to arrange delivery of binder in anticipation of N. Bramson's deposition
Bonacorsi, Lauri A.	11/19/2021	0.30	Arrange logistics of sending binder to D. Rody
Bonacorsi, Lauri A.	11/19/2021	2.70	Research new questions related to discovery sanctions as requested by D. Hay
Bonacorsi, Lauri A.	11/19/2021	0.10	Review D. Hay's letter to court regarding sanctions
Bonacorsi, Lauri A.	11/19/2021	0.10	Review summary judgment outline in anticipation of drafting portion of motion
Bonacorsi, Lauri A.	11/19/2021	1.40	Pull cases with summary judgment language relevant to case
Todd, Gordon D.	11/19/2021	0.30	Review draft interrogatories to City
Rody, David M.	11/19/2021	0.30	Review and comment on pre-motion letter for summary judgment motion
Hay, Daniel J.	11/20/2021	0.60	Review and comment on supplemental privilege log and supplemental production
Bonacorsi, Lauri A.	11/20/2021	1.00	Draft legal standard section of motion for summary judgment
Bonacorsi, Lauri A.	11/20/2021	1.10	Draft history of stipulation background section of motion for summary judgment
Bonacorsi, Lauri A.	11/20/2021	1.20	Draft billboard ordinance amendments section of motion for summary judgment
Rody, David M.	11/20/2021	0.50	Review and comment on Sanctions motion and pre-motion letter
Hay, Daniel J.	11/21/2021	0.40	Prepare and circulate talking points and agenda for privilege log meet and confer
Craig, Laura K.	11/21/2021	0.80	Attention to preparing supplemental production and privilege log
Bonacorsi, Lauri A.	11/21/2021	0.30	Revise draft summary judgment motion sections
Bonacorsi, Lauri A.	11/21/2021	1.30	Draft updated initial disclosures to include individuals relevant based on document review
Rody, David M.	11/21/2021	0.30	Review and comment on outline for meet and confer with NR counsel
Hay, Daniel J.	11/22/2021	1.20	Outline Bramson deposition for D. Rody
Hay, Daniel J.	11/22/2021	0.20	Revise sanctions motion based on OGC review
Craig, Laura K.	11/22/2021	1.60	Attention to discovery matters, including revising amended initial disclosures, review of partial motion for summary judgment

Bonacorsi, Lauri A.	11/22/2021	2.90	Conduct first level review of New Rochelle's November 16, 2021 production
Bonacorsi, Lauri A.	11/22/2021	0.20	Prepare for meeting on summary judgment motion with L. Mulherin
Bonacorsi, Lauri A.	11/22/2021	0.10	Coordinate meeting with L. Mulherin to discuss summary judgment motion
Bonacorsi, Lauri A.	11/22/2021	0.60	Meet with L. Mulherin on summary judgment draft feedback
Bonacorsi, Lauri A.	11/22/2021	0.30	Incorporate edits from L. Mulherin for summary judgment draft
Ballard, Emma A.	11/22/2021	1.00	Assist L. Mulherin and L. Bonacorsi with creating binder of documents for Bramson deposition
Todd, Gordon D.	11/22/2021	0.30	Review City's response to discovery demand letter and assess strategy for sanctions motion
Rody, David M.	11/22/2021	0.30	Correspondence with Sidley team re: strategy for meet and confer with NR counsel
Hay, Daniel J.	11/23/2021	0.60	Revise and prepare sanctions motion for filing
Hay, Daniel J.	11/23/2021	0.50	Meet and confer with J. Nonkes re privilege log dispute
Hay, Daniel J.	11/23/2021	0.50	Follow up call with D. Rody and L. Mulherin re privilege log and sanctions motion
Hay, Daniel J.	11/23/2021	0.20	Call with L. Mulherin re discovery status
Hay, Daniel J.	11/23/2021	1.30	Revise sanctions motion based on meet and confer
Craig, Laura K.	11/23/2021	0.50	Review and revise draft motion for partial summary judgment
Craig, Laura K.	11/23/2021	0.50	Follow up call with D. Rody and D. Hay regarding privilege log and sanctions motion
Craig, Laura K.	11/23/2021	0.50	Meet and confer with J. Nonkes regarding privilege log dispute
Craig, Laura K.	11/23/2021	0.20	Call with D. Hay regarding discovery matters
Craig, Laura K.	11/23/2021		Attention to discovery matters, including QC of upcoming production and privilege log and draft correspondence to opposing counsel regarding outstanding discovery matters
Craig, Laura K.	11/23/2021	1.30	Attention to preparing sanctions motion, including conducting legal research regarding privilege issues and review of draft motion
Craig, Laura K.	11/23/2021	0.40	Call with L. Bonacorsi regarding draft motion for summary judgment
Bonacorsi, Lauri A.	11/23/2021	0.40	Review initial disclosure edits to send to D. Hay for feedback
Bonacorsi, Lauri A.	11/23/2021	4.20	Revise draft motion for summary judgment
Bonacorsi, Lauri A.	11/23/2021	0.60	Review complaint to find gaps in background section of summary judgment motion
Bonacorsi, Lauri A.	11/23/2021	0.10	Draft email to L. Mulherin to provide updates on summary judgment motion
Bonacorsi, Lauri A.	11/23/2021	0.80	Research Judge's opinions to find his framing of the summary judgment standard
Bonacorsi, Lauri A.	11/23/2021	0.10	Send summary judgment draft of background section and standard to D. Hay and L. Mulherin
Todd, Gordon D.	11/23/2021	0.40	Attention to discovery issues including meet and confer and sanctions motion
Rody, David M.	11/23/2021	0.50	Correspondence with Sidley team re: deposition and discovery schedule
Rody, David M.	11/23/2021	0.70	Prepare for and attend meet and confer call with J. Nonkes and Sidley team
Rody, David M.	11/23/2021	0.50	Conferences and correspondence with Sidley team re: strategy in light of meet and confer call
Rody, David M.	11/23/2021	0.80	Review and comment on revised discovery sanctions motion
Craig, Laura K.	11/24/2021	0.30	Call with D. Hay regarding sanctions motion
Craig, Laura K.	11/24/2021		Attention to discovery matters, including review of correspondence from J. Nonkes, review of document produced by New Rochelle and correspondence with L. Bonacorsi regarding same, and drafting correspondence to opposing counsel regarding discovery matters
Bonacorsi, Lauri A.	11/24/2021	3.00	Complete summary of 2021.11.16 New Rochelle production for D. Hay and L. Mulherin
Rody, David M.	11/24/2021	0.50	Correspondence with Sidley team and NR counsel re: discovery and deposition issues
Rody, David M.	11/24/2021	2.50	Review case documents to prepare for depositions
Rody, David M.	11/26/2021	0.50	Review and comment on case filings with Sidley team
Craig, Laura K.	11/27/2021	0.70	Draft motion for partial summary judgment
Bonacorsi, Lauri A.	11/27/2021	2.00	Prepare binder for P. Vacca deposition by summarizing relevant documents
Bonacorsi, Lauri A.	11/27/2021	0.50	Prepare binder for P. Vacca deposition by organizing binder table of contents based on Relativity output
Craig, Laura K.	11/28/2021	1.50	Draft motion for summary judgment, including legal research regarding same
Craig, Laura K.	11/28/2021	0.20	Review of Vacca deposition preparation materials
Bonacorsi, Lauri A.	11/28/2021	1.80	Revise table of contents for P. Vacca deposition prep. Binder
Bonacorsi, Lauri A.	11/28/2021	0.50	Download relevant documents for P. Vacca binder
Bonacorsi, Lauri A.	11/28/2021		Send table of contents and summary of document search process for L. Mulherin to review in anticipation of making P. Vacca's deposition prep binder
Rody, David M.	11/28/2021	2.50	Review NR and company correspondence to prepare for depositions
Hay, Daniel J.	11/29/2021	1.10	Draft submission for December 3 status conference
Hay, Daniel J.	11/29/2021	0.30	Call with G. Todd, D. Rody, and L. Mulherin re New Rochelle's discovery response
Hay, Daniel J.	11/29/2021	0.60	Review and draft response to New Rochelle's discovery correspondence
Hay, Daniel J.	11/29/2021	1.70	Review and edit draft motion for partial summary judgment
Hay, Daniel J.	11/29/2021	0.60	Call with L. Mulherin re motion for summary judgment
Hay, Daniel J.	11/29/2021	0.40	Review second amended initial disclosures and second set of interrogatories
Craig, Laura K.	11/29/2021	0.60	Call with D. Hay regarding motion for summary judgment and deposition preparation
Craig, Laura K.	11/29/2021	2.50	Draft motion for summary judgment, including legal research regarding same
Craig, Laura K.	11/29/2021		Attention to discovery matters, including review of correspondence from opposing counsel, review of Vacca deposition preparation materials, including call with L. Bonacorsi regarding deposition preparation materials, and review of privilege log and documents for production
Craig, Laura K.	11/29/2021	2.00	Call with G. Todd, D. Rody, and D. Hay regarding discovery matters
Bonacorsi, Lauri A.	11/29/2021	0.20	Correspondence with L. Mulherin about including permanent injunction argument in summary judgment motion
Bonacorsi, Lauri A.	11/29/2021		Research potential support for New Rochelle's contention that SDNY requires depositions of local officials be taken in the county those officials work
Bonacorsi, Lauri A.	11/29/2021	1.20	Send folder with P. Vacca deposition prep documents to L. Mulherin
Bonacorsi, Lauri A.	11/29/2021	0.10	Review and compile documents for A. Wayner deposition preparation, including correspondence with L. Mulherin about responsive documents to include in binder for A. Wayner deposition
Bonacorsi, Lauri A.	11/29/2021	0.80	L. Mulherin about responsive documents to include in binder for A. Wayner deposition
Bonacorsi, Lauri A.	11/29/2021	2.50	Summarize documents relevant to A. Wayner deposition in anticipation of preparing binder
Todd, Gordon D.	11/29/2021	0.50	Attention to discovery issues including dispute with City over financial data and new custodians, and letter to court regarding open issues
Rody, David M.	11/29/2021	2.40	Review NR and company documents to prepare for depositions

Rody, David M.	11/29/2021	1.00	Correspondence and conferences with Sidley team re: NR response to discovery demands
Rody, David M.	11/29/2021	0.60	Review and comment on draft response to NR correspondence and letter to court
Hay, Daniel J.	11/30/2021	5.80	Revise motion for partial summary judgment
Hay, Daniel J.	11/30/2021	0.60	Call with L. Mulherin re supplemental privilege log
Hay, Daniel J.	11/30/2021	1.40	Draft response to New Rochelle's cross-motion for sanctions
Hay, Daniel J.	11/30/2021	0.50	Review Defendants' response to sanctions motion
Craig, Laura K.	11/30/2021	0.50	Attention to New Rochelle's response to sanctions motion, including CCO response to said filing
Craig, Laura K.	11/30/2021	2.10	Attention to preparing documents and privilege log for production
			Conduct research on permanent injunction rules for L. Mulherin in anticipation of summary judgment motion
Bonacorsi, Lauri A.	11/30/2021	1.60	Conduct research concerning whether privilege logs may be confidential
Bonacorsi, Lauri A.	11/30/2021	2.60	Summarize documents relevant to A. Wayner as part of review in anticipation of preparing binder for deposition prep
Bonacorsi, Lauri A.	11/30/2021	3.10	Review correspondence between the parties concerning New Rochelle's discovery productions
Bonacorsi, Lauri A.	11/30/2021	0.30	Review City response to motion for sanctions and cross-motion and strategize regarding same with D. Hay
Todd, Gordon D.	11/30/2021	0.90	Review and finalize letters re discovery violations and summary judgment motion
Todd, Gordon D.	11/30/2021	0.40	Review and revise draft brief in opposition to cross motion for sanction
Rody, David M.	11/30/2021	1.50	Review NR and company documents to prepare for depositions
Rody, David M.	11/30/2021	1.00	Review and comment on draft outline of Branson deposition questions
Rody, David M.	11/30/2021	0.70	Review NR filing re: privilege log challenge and correspond with Sidley team re: proposed response
Hay, Daniel J.	12/1/2021	1.20	Prepare for oral argument on sanctions motion
Hay, Daniel J.	12/1/2021	0.80	Revise and file response to cross-motion for sanctions
Hay, Daniel J.	12/1/2021	2.10	Revise motion for partial summary judgment
Hay, Daniel J.	12/1/2021	0.60	Call with D. Rody and L. Mulherin re Bramson deposition preparation
Craig, Laura K.	12/1/2021	1.10	Revise draft motion for partial summary judgment
Craig, Laura K.	12/1/2021	2.80	Attention to discovery matters, including finalizing interrogatories, amended initial disclosures, privilege log, and productions
Craig, Laura K.	12/1/2021	0.60	Call with D. Hay and D. Rody regarding deposition preparation
Craig, Laura K.	12/1/2021	0.10	Call with D. Hay regarding discovery tasks
Bonacorsi, Lauri A.	12/1/2021	0.20	Correspondence with L. Mulherin and D. Hay regarding finalizing motion for summary judgment draft for G. Todd and D. Rody
Bonacorsi, Lauri A.	12/1/2021	2.60	Address D. Hay's comments on draft motion for summary judgment
Bonacorsi, Lauri A.	12/1/2021	0.80	Analyze documents relevant to A. Wayner in anticipation of deposition
Bonacorsi, Lauri A.	12/1/2021	0.40	Proofread initial disclosures prior to submission
Bonacorsi, Lauri A.	12/1/2021	0.30	Proofread amended interrogatories prior to submission
Bonacorsi, Lauri A.	12/1/2021	1.20	Conduct research for D. Hay concerning discovery sanctions in anticipation of oral argument
Todd, Gordon D.	12/1/2021	0.20	Review additional correspondence by parties with MJ Krause particularly with respect to privilege issues
Todd, Gordon D.	12/1/2021	0.60	Review and revise supplemental log requests, supplemental privilege log, and final document production
Rody, David M.	12/1/2021	0.20	Review NR's new letter to the court on discovery
Rody, David M.	12/1/2021	0.60	Correspondence and conferences with Sidley team re: deposition prep and strategy for N. Bramson and other depositions
Rody, David M.	12/1/2021	1.00	Review and comment on draft motion for partial summary judgment
Hay, Daniel J.	12/2/2021	3.60	Prepare for oral argument on sanctions motion
Hay, Daniel J.	12/2/2021	0.30	Respond to email from J. Nonkes re billboard revenue
Craig, Laura K.	12/2/2021	0.30	Call with D. Hay regarding hearing with M.J. Krause
Craig, Laura K.	12/2/2021	2.20	Attention to discovery matters, including preparation for hearing and finalizing supplemental production/privilege log
Bonacorsi, Lauri A.	12/2/2021	2.70	Prepare analysis of research for D. Hay concerning discovery sanctions
Bonacorsi, Lauri A.	12/2/2021	0.10	Correspondence with L. Mulherin regarding timeline for A. Wayner deposition preparation binder
Bonacorsi, Lauri A.	12/2/2021	1.10	Analyze relevant documents concerning A. Wayner in anticipation of deposition
Bonacorsi, Lauri A.	12/2/2021	1.00	Prepare summaries of key points from documents Relevant to A. Wayner deposition preparation binder
Ballard, Emma A.	12/2/2021	1.90	Assist D. Hay with creating a binder of key documents for Dec 3 conference
Todd, Gordon D.	12/2/2021	4.30	Review and revise draft motion for partial summary judgment
Rody, David M.	12/2/2021	0.50	Correspondence with Sidley team and defendants re: discovery issues
Rody, David M.	12/2/2021	0.70	Review and comment on talking points for court conference
Hay, Daniel J.	12/3/2021	2.60	Prepare for argument on sanctions motion
Hay, Daniel J.	12/3/2021	1.20	Review edits to motion for summary judgment from G. Todd and D. Rody
Hay, Daniel J.	12/3/2021	1.80	Attend oral argument on sanctions motion
Craig, Laura K.	12/3/2021	1.90	Attention to discovery matters, including preparation for hearing
Craig, Laura K.	12/3/2021	0.20	Review and revise N. Bramson deposition outline
Craig, Laura K.	12/3/2021	2.70	Attend status conference before Magistrate Krause, including preparation and post-call discussion
Bonacorsi, Lauri A.	12/3/2021	0.80	Organize listing of documents relevant to A. Wayner deposition preparation binder
Bonacorsi, Lauri A.	12/3/2021	0.60	Revise draft summary judgment motion
Bonacorsi, Lauri A.	12/3/2021	2.30	Prepare e-binder of documents relevant to A. Wayner in anticipation of deposition
Todd, Gordon D.	12/3/2021	1.20	Review and revise draft motion for partial summary judgment
Hay, Daniel J.	12/4/2021	0.30	Revise statement of material facts
Bonacorsi, Lauri A.	12/4/2021	0.50	Review A. Wayner binder for final edits to send to L. Mulherin in anticipation of deposition
Rody, David M.	12/4/2021	0.20	Correspondence with Sidley team re: discovery strategy
Hay, Daniel J.	12/6/2021	0.50	Draft email to New Rochelle following up on status conference
Hay, Daniel J.	12/6/2021	0.50	Draft proposed order
Craig, Laura K.	12/6/2021	1.90	Review and revise N. Bramson deposition outline

Bonacorsi, Lauri A.	12/6/2021	0.30	Review current partial statement of undisputed material facts in anticipation of drafting remainder of the statement
Bonacorsi, Lauri A.	12/6/2021	6.30	Draft statement of undisputed material facts for partial motion for summary judgment
Ballard, Emma A.	12/6/2021	0.20	Draft weekly update to D. Hay and L. Mulherin regarding responsive topics
Todd, Gordon D.	12/6/2021	0.30	Correspondence with city regarding outstanding discovery tasks and other scheduling issues
Rody, David M.	12/6/2021	0.50	Correspondence with Sidley team re: response to NR on discovery issues
Hay, Daniel J.	12/7/2021	0.30	Draft and submit Thruway FOIL request
Hay, Daniel J.	12/7/2021	0.60	Draft response to New Rochelle on discovery items
Craig, Laura K.	12/7/2021	0.40	Review and respond to comments from L. Bonacorsi in statement of undisputed material facts
Bonacorsi, Lauri A.	12/7/2021	0.50	Revise statement of undisputed material facts for summary judgment motion
		0.10	Send L. Mulherin statement of undisputed material facts in anticipation of partial summary judgment motion
Bonacorsi, Lauri A.	12/7/2021	0.90	Update master chronology of with key documents from analysis of New Rochelle's 11.16 production
Bonacorsi, Lauri A.	12/7/2021	0.70	Revise summary judgment brief based on updates to statement of undisputed material fact
Bonacorsi, Lauri A.	12/7/2021	1.20	Revise statement of undisputed material facts with focus on comments by L. Mulherin
Rody, David M.	12/7/2021	0.50	Correspondence with Sidley team and NR counsel re: discovery disputes
Hay, Daniel J.	12/8/2021	0.20	Call w B. Katz (Vector counsel) re depositions
Craig, Laura K.	12/8/2021	2.40	Attention to discovery matters, including preparation for A. Wayner deposition; Review of documents for summary judgment motion statement of undisputed material facts
Bonacorsi, Lauri A.	12/8/2021	0.20	Meet with E. Ballard to prepare search to locate factual gaps in statement of undisputed material facts
		0.50	Review revised statement of undisputed material facts in anticipation of sending updated draft to L. Mulherin
Bonacorsi, Lauri A.	12/8/2021	0.20	Correspondence with L. Mulherin regarding next steps for statement of undisputed material facts
Bonacorsi, Lauri A.	12/8/2021	0.40	Correspondence with L. Mulherin regarding A. Wayner deposition preparation analysis.
Bonacorsi, Lauri A.	12/8/2021	0.20	Correspondence with D. Hay and L. Mulherin about next steps in deposition preparation
Ballard, Emma A.	12/8/2021	1.50	Draft weekly update to D. Hay and L. Mulherin regarding responsive topics
Craig, Laura K.	12/9/2021	1.70	Attention to discovery matters, including preparing exhibits for statement of material facts and drafting subpoenas
Bonacorsi, Lauri A.	12/9/2021	1.60	Research timing for service of deposition subpoena
Bonacorsi, Lauri A.	12/9/2021	1.10	Prepare analysis of research findings for D. Hay and L. Mulherin regarding deposition timing
		0.20	Send out weekly update to L. Mulherin, D. Hay, and L. Bonacorsi of City of New Rochelle City Council summary of responsive topics
Ballard, Emma A.	12/9/2021	0.80	Correspondence with Sidley team re: strategy for depositions and MSJ
Hay, Daniel J.	12/10/2021	0.30	Research and compose response to New Rochelle on privilege log issue
Reilly, Ally N.	12/10/2021	1.00	Proofread Complaint for D. Hay
		3.70	Attention to preparing statement of undisputed material facts, including revising draft and compiling exhibits
Craig, Laura K.	12/10/2021	0.60	Research regarding deposition subpoenas
Craig, Laura K.	12/10/2021	0.40	Attention to discovery matters, including review of privilege log to respond to question from opposing counsel regarding log entries
Bonacorsi, Lauri A.	12/10/2021	7.80	Research case law concerning response to deposition subpoena
Bonacorsi, Lauri A.	12/10/2021	1.30	Prepare analysis of research concerning responding to deposition subpoena
Bonacorsi, Lauri A.	12/10/2021	0.10	Assist L. Mulherin in locating documents to include in statement of undisputed material facts
Hay, Daniel J.	12/12/2021	0.90	Review statement of undisputed material facts
Craig, Laura K.	12/12/2021	0.10	Review D. Hay comments to draft statement of undisputed material facts
Hay, Daniel J.	12/13/2021	1.00	Review revised privilege log
Craig, Laura K.	12/13/2021	1.50	Attention to discovery matters, including review of defendants' privilege log and drafting authentication declaration in support of motion for summary judgment
Bonacorsi, Lauri A.	12/13/2021	0.30	Review updated statement of undisputed material facts and exhibit list
Bonacorsi, Lauri A.	12/13/2021	0.20	Correspondence with research team regarding search on P. Vacca and A. Wayner to prepare for depositions
Bonacorsi, Lauri A.	12/13/2021	1.70	Revise Wayner document summaries and accompanying binder of documents with focus on eliminating documents that are not key
Rody, David M.	12/13/2021	0.20	Correspondence with NR counsel re: privilege log
Hay, Daniel J.	12/14/2021	1.40	Review New Rochelle's amended privilege log
Hay, Daniel J.	12/14/2021	0.40	Call with G. Todd, D. Rody, and L. Mulherin re deposition schedule and motion for partial summary judgment
Hay, Daniel J.	12/14/2021	1.40	Draft letter to Judge Krause re Defendants' compliance with December 3 order
Craig, Laura K.	12/14/2021	1.20	Attention to discovery matters, including review of New Rochelle production and privilege log and call with D. Hay regarding same
Craig, Laura K.	12/14/2021	3.00	Draft and revise components of motion for partial summary judgment, including attorney declaration, statement of undisputed material facts, and brief in support
Craig, Laura K.	12/14/2021	0.40	Call with G. Todd, D. Rody, and D. Hay regarding discovery matters
Ballard, Emma A.	12/14/2021	1.50	Assist L. Mulherin with finalizing documents for a binder for deposition
Todd, Gordon D.	12/14/2021	0.40	Confer with D. Rody, D. Hay, L. Mulherin regarding deposition schedule strategy
Rody, David M.	12/14/2021	0.70	strategy
Hay, Daniel J.	12/15/2021	1.50	Draft letter to Judge Krause re Gill documents and privilege log
Hay, Daniel J.	12/15/2021	0.90	Review attorney declaration in support of motion for summary judgment
Hay, Daniel J.	12/15/2021	0.40	Revise motion for partial summary judgment
Mawdsley, Karen A.	12/15/2021	0.90	Prepare draft Table of Authorities for memorandum of law in support of motion for partial summary judgment
Craig, Laura K.	12/15/2021	3.10	Attention to discovery matters, including review of New Rochelle's privilege log, review of financial data produced by Defendants, drafting letter to Court regarding discovery issues, and correspondence with opposing counsel regarding discovery matters
Craig, Laura K.	12/15/2021	1.20	Revise draft attorney declaration and exhibit list
Ballard, Emma A.	12/15/2021	0.60	Assist L. Mulherin with creating excel chart of revenues

Todd, Gordon D.	12/15/2021	0.50	Review and revise draft letter to magistrate regarding open discovery items and MSJ briefing
Todd, Gordon D.	12/15/2021	0.40	Strategize with Sidley team regarding reply to City's opposition and open discovery items
Todd, Gordon D.	12/15/2021	0.30	Review City's opposition for motion for leave to file PMSJ
Rody, David M.	12/15/2021	0.70	Correspondence with Sidley team re: strategy in light of NR's response to pre-motion letter
Hay, Daniel J.	12/16/2021	0.70	Review and respond to correspondence from New Rochelle re privilege log
Mawdsley, Karen A.	12/16/2021	5.70	Cite-check memorandum of law in support of motion for partial summary judgment
Craig, Laura K.	12/16/2021	0.60	Call with D. Hay regarding research related to New Rochelle's affirmative defenses
Craig, Laura K.	12/16/2021	0.10	Review correspondence regarding privilege log matters raised by J. Nonkes
Craig, Laura K.	12/16/2021	4.40	Research and draft summary regarding responses to New Rochelle's affirmative defenses
			Review New Rochelle's response to prospective partial summary judgment motion alongside D. Hay's proposed strategy for responding
Bonacorsi, Lauri A.	12/16/2021	0.40	Analyze RFP-related documents regarding New Rochelle's arguments against summary judgment
Ballard, Emma A.	12/16/2021	0.50	Assist L. Mulherin with updating exhibit list and files for declaration
Ballard, Emma A.	12/16/2021	0.30	Assist L. Mulherin with updating master chronological list of documents
Ballard, Emma A.	12/16/2021	0.50	Assist L. Mulherin with updating document with defendant's affirmative defenses
Todd, Gordon D.	12/16/2021	0.40	Correspondence with City counsel regarding deposition dates and open discovery items
Rody, David M.	12/16/2021	1.00	Correspondence with Sidley team and client re: depositions and other discovery issues
Hay, Daniel J.	12/17/2021	1.70	Draft and file response to New Rochelle discovery letter
Craig, Laura K.	12/17/2021	0.80	Revise draft motion for summary judgment
			Attention to discovery matters, including investigation regarding privilege matters raised by defendants and review of letter to court regarding discovery issues
Craig, Laura K.	12/17/2021	0.80	Cite check summary judgment motion
Todd, Gordon D.	12/17/2021	0.50	Prepare for and participate in call with S. Llach and counsel for OFM regarding settlement talks
Todd, Gordon D.	12/17/2021	0.30	Attention to letter exchange with City to Magistrate Judge
Rody, David M.	12/17/2021	0.40	Review and revise letter to court
Rody, David M.	12/17/2021	0.40	Correspondence with NR counsel and Sidley team re: ongoing discovery disputes
Hay, Daniel J.	12/20/2021	1.00	Revise motion for summary judgment and ancillary filings
Craig, Laura K.	12/20/2021	0.30	Attention to discovery matters, including review of Court order regarding discovery disputes
Craig, Laura K.	12/20/2021	0.20	Attention to preparing motion for summary judgment
Bonacorsi, Lauri A.	12/20/2021	0.90	Draft notice of motion for summary judgment motion
Bonacorsi, Lauri A.	12/20/2021	0.80	Research question regarding affirmative defenses in summary judgment motion in anticipation of filing motion
Todd, Gordon D.	12/20/2021	0.30	Review order granting motion for partial summary judgment and related correspondence with Sidley team and S. Llach
Rody, David M.	12/20/2021	0.80	Correspondence with Sidley team and client re: court's decision on motion and next steps in filing motion
Todd, Gordon D.	12/21/2021	0.40	Final review of draft motion for summary judgment
			Attention to discovery matters, including updating deposition plan regarding noticed depositions, drafting response to opposing counsel regarding document request, and research regarding SDNY Apex deposition standard
Craig, Laura K.	12/22/2021	0.80	Correspondence with City regarding deposition dates, notices, and subpoenas
Rody, David M.	12/22/2021	0.80	Correspondence with client and Sidley team re: proposed deposition dates and conflicts
Hay, Daniel J.	12/23/2021	0.80	Review New Rochelle's 30(b)(6) notice and draft topics for Clear Channel's 30(b)(6) notice
Hay, Daniel J.	12/23/2021	0.60	Call w S. Llach, G. Todd, D. Rody, and L. Mulherin re deposition schedule
Hay, Daniel J.	12/23/2021	0.70	Draft email to New Rochelle re deposition scheduling
			Attention to discovery matters, including preparing deposition notices and subpoenas, drafting work plan of discovery items and deadlines, reviewing 30(b)(6) notice served by defendants
Craig, Laura K.	12/23/2021	2.20	Call with internal team and client regarding depositions, including post-call discussion with internal team only
Rody, David M.	12/23/2021	0.70	Conferences and correspondence with Sidley team and client re: deposition schedule and personnel
Rody, David M.	12/23/2021	0.50	Correspondence with Sidley team and NR counsel re: discovery issues
Hay, Daniel J.	12/27/2021	2.50	Final proofread and revisions of motion for summary judgment and ancillary documents
Hay, Daniel J.	12/27/2021	1.40	Prepare for TRA deposition
Mawdsley, Karen A.	12/27/2021	1.50	Review MSJ documents (notice of motion, SUMF, Hay Declaration, motion, memorandum of law supporting motion) and update Table of Contents and Table of Authorities in memorandum of law
			Finalize and edit motion for partial summary judgment, including supporting papers (e.g., declaration, statement of undisputed material facts)
Craig, Laura K.	12/27/2021	5.70	Prepare exhibits for partial motion for summary judgment filing
Bonacorsi, Lauri A.	12/27/2021	2.70	Final review and revision of motion for partial summary judgment
Todd, Gordon D.	12/27/2021	1.80	Attention to preparing binder of summary judgment filings for Judge Krause, including review of cover letter
Craig, Laura K.	12/28/2021	0.50	Attend to filing of partial motion for summary judgment
			Attention to discover matters, including drafting second set of Requests for Admission, drafting cover letter for hard copy privilege logs for Court and finalizing package to court
Craig, Laura K.	12/29/2021	1.60	Assist in preparing RFAs.
Bonacorsi, Lauri A.	12/29/2021	1.30	Prepare for TRA deposition
Hay, Daniel J.	12/30/2021	2.30	Meet and confer w New Rochelle and follow up call w D. Rody and L. Mulherin re privilege log issues
Craig, Laura K.	12/30/2021	1.00	Attention to discovery matters, including drafting A. Wayner deposition outline
			Attend meet and confer with opposing counsel, D. Hay, and D. Rody, including post-meet and confer internal discussion
Craig, Laura K.	12/30/2021	1.00	Prepare folder of summary judgment filings in anticipation of potential oral argument.
Rody, David M.	12/30/2021	0.80	strategy
Hay, Daniel J.	12/31/2021	1.00	Provide follow up information to New Rochelle's counsel re privilege log dispute
Craig, Laura K.	12/31/2021	0.20	Review and revise correspondence to opposing counsel regarding privilege log documents
Rody, David M.	12/31/2021	0.20	Correspondence with Sidley team and NR counsel re: privilege log issues
Hay, Daniel J.	1/3/2022	0.70	Review and revise second set of requests for admission

Craig, Laura K.	1/3/2022	0.20	Call with G. Todd, D. Rody, and D. Hay regarding deposition schedules and case management
Craig, Laura K.	1/3/2022	1.30	Attention to discovery matters, including preparing courtesy copies for M.J. Krause, finalizing draft Requests for Admission, correspondence with deposition vendor regarding services, and review of Defendants' redaction log
Ballard, Emma A.	1/3/2022	1.00	Assist L.Mulherin with creating binders and mailing to SDNY
Rody, David M.	1/3/2022	0.30	Conferences and correspondence with Sidley team re: deposition strategy
Hay, Daniel J.	1/4/2022	0.60	Draft letter to the court re deposition schedule
Hay, Daniel J.	1/4/2022	0.70	Draft proposed remote deposition protocol
Craig, Laura K.	1/4/2022	0.60	Attention to discovery matters, including revising deposition protocol, letter to court regarding schedule, scheduling order
Craig, Laura K.	1/4/2022	0.20	Call with D. Hay regarding discovery matters
Rody, David M.	1/4/2022	0.30	Correspondence with NR counsel and court re: discovery schedule
Hay, Daniel J.	1/5/2022	0.30	Finalize and file letter to Court re deposition schedule
Hay, Daniel J.	1/5/2022	0.40	Draft proposed ESI protocol
Hay, Daniel J.	1/5/2022	0.20	Draft email to opposing counsel re capital committee approval
Hay, Daniel J.	1/5/2022	0.30	Draft email to Harry Coghlan re deposition
Craig, Laura K.	1/5/2022	0.10	Attention to discovery matters, including review of draft objections to 30(b)(6) notice
Bonacorsi, Lauri A.	1/5/2022	1.80	Draft objections and responses to Defendants' 30(b)(6) deposition notice
Hay, Daniel J.	1/6/2022	1.50	Draft status conference letter to the court
Craig, Laura K.	1/6/2022	0.10	Attention to discovery issues, including correspondence with deposition vendor regarding schedule change and D. Rody comments to remote deposition protocol
Rody, David M.	1/6/2022	0.40	Review and revise deposition protocol draft stipulation
Hay, Daniel J.	1/7/2022	1.30	Revise status conference submission
Hay, Daniel J.	1/7/2022	0.40	Revise remote deposition protocol based on comments from D. Rody
Craig, Laura K.	1/7/2022	1.00	Review and revise letter to Court regarding privilege log issues
Rody, David M.	1/7/2022	0.20	Attention to pre-conference filings on discovery issues
Hay, Daniel J.	1/8/2022	0.60	Review objections to 30(b)(6) deposition notice
Hay, Daniel J.	1/9/2022	2.00	Prepare for status conference
Hay, Daniel J.	1/10/2022	2.00	Prepare for, attend, and debrief status conference
Bonacorsi, Lauri A.	1/11/2022	0.50	Revise objections to notice of deposition to send to G. Todd
Hay, Daniel J.	1/13/2022	0.50	Review Thruway Authority's FOIL production and corresponding sign documentation
Rody, David M.	1/13/2022	0.30	Correspondence with Sidley team and NR counsel re: discovery requests
Craig, Laura K.	1/14/2022	0.10	Correspondence regarding discovery matters
Bonacorsi, Lauri A.	1/14/2022	3.40	Analyze Thruway FOIL response, including drafting summary regarding same
Bonacorsi, Lauri A.	1/15/2022	1.50	Analyze Thruway FOIL response, including drafting summary regarding same
Hay, Daniel J.	1/16/2022	1.00	Review L. Bonacorsi's findings re FOIL response
Craig, Laura K.	1/16/2022	0.70	Review Thruway FOIL response summary, including research regarding 21 Cottage Place sign documentation
Bonacorsi, Lauri A.	1/16/2022	2.10	Analyze Thruway FOIL response, including drafting summary regarding same
Hay, Daniel J.	1/17/2022	0.80	Draft email summary of L. Bonacorsi's findings re FOIL production
Hay, Daniel J.	1/17/2022	0.80	Review New Rochelle's second supplemental privilege log and redaction log
Bonacorsi, Lauri A.	1/17/2022	0.40	Analyze Thruway FOIL response, including drafting summary regarding same
Todd, Gordon D.	1/17/2022	0.20	Review analysis of Thruway inventory and supply same to S. Llach
Hay, Daniel J.	1/18/2022	0.20	Call with L. Mulherin re discovery status and New Rochelle's revised privilege log
Craig, Laura K.	1/18/2022	0.60	Attention to discovery matters, including review of New Rochelle's privilege log and call with D. Hay regarding same
Hay, Daniel J.	1/19/2022	0.60	Review New Rochelle's responses to second set of interrogatories and draft summary of deficiencies for litigation team
Hay, Daniel J.	1/19/2022	1.60	Draft deficiency letter in response to second set of interrogatories
Hay, Daniel J.	1/19/2022	1.50	Revise 30(b)(6) deposition notice and objections to New Rochelle's deposition notice
Craig, Laura K.	1/19/2022	1.00	Attention to discovery matters, including review of Defendants' interrogatory responses and drafting letter to opposing counsel regarding privilege log deficiencies
Rody, David M.	1/19/2022	0.70	Correspondence with Sidley team and NR counsel re: discovery filings and responses
Hay, Daniel J.	1/20/2022	0.50	Revise and send deficiency letter re: response to second set of interrogatories
Craig, Laura K.	1/20/2022	0.70	Attention to preparing letter to defendants' regarding privilege log, including analysis of privilege logs for deficiencies
Craig, Laura K.	1/20/2022	0.10	Call with J. Nonkes regarding redacted documents
Rody, David M.	1/20/2022	0.50	Correspondence with Sidley team re: responses to discovery filings
Craig, Laura K.	1/21/2022	1.00	Draft letter to opposing counsel regarding privilege log deficiencies, including review of privilege logs and legal research regarding same
Hay, Daniel J.	1/24/2022	0.60	Review and finalize objections to 30(b)(6) deposition notice
Craig, Laura K.	1/24/2022	0.30	Finalize and serve objections to 30(b)(6) notice
Craig, Laura K.	1/25/2022	0.10	Attention to privilege log matters, including responding to J. Nonkes question regarding privileged document
Hay, Daniel J.	1/26/2022	0.70	Meet and confer w J. Nonkes re interrogatories and privilege log
Craig, Laura K.	1/26/2022	0.70	Call with D. Hay and J. Nonkes regarding discovery matters
Hay, Daniel J.	1/27/2022	0.30	Draft follow up email to J. Nonkes re interrogatory responses
Hay, Daniel J.	1/28/2022	0.30	Review client-prepared map of New Rochelle inventory
Bonacorsi, Lauri A.	1/28/2022	1.50	Analysis of FOIL response with focus on presentation of information
Todd, Gordon D.	1/28/2022	0.30	Review and comment on market map of signs in New Rochelle
Craig, Laura K.	1/30/2022	0.50	Research regarding Rule 37 discovery sanctions
Hay, Daniel J.	1/31/2022	1.00	Review and comment on revised versions of Thruway permit map
Hay, Daniel J.	1/31/2022	2.20	Draft pre-motion letter to court re February status conference
Craig, Laura K.	1/31/2022	1.40	Attention to preparing letter update to Court, including legal research regarding Rule 37 sanctions, analysis of privilege logs, and revisions to draft letter
Hay, Daniel J.	2/1/2022	0.50	Draft email re potentially privileged documents produced by New Rochelle

Hay, Daniel J.	2/1/2022	0.60	Finalize and serve pre-conference letter
Rody, David M.	2/1/2022	0.30	Correspondence with Sidley team re: discovery letter to court
Hay, Daniel J.	2/2/2022	0.70	Review opposition to motion for summary judgment
Hay, Daniel J.	2/2/2022	1.60	Research and outline reply in support of motion for summary judgment
			Attention to preparing reply in support of motion for summary judgment, including review of opposition brief, research regarding reply, and call with D. Hay and L. Bonacorsi regarding same
Craig, Laura K.	2/2/2022	1.70	
Bonacorsi, Lauri A.	2/2/2022	0.80	Call with D. Hay and L. Mulherin regarding drafting Reply to summary judgment opposition
Bonacorsi, Lauri A.	2/2/2022	3.00	Conduct research on applicable standards for partial summary judgment reply brief
Bonacorsi, Lauri A.	2/2/2022	1.50	Review Defendants' Response brief in opposition of partial summary judgment
Hay, Daniel J.	2/3/2022	3.80	Draft reply in support of motion for summary judgment
			Attention to discovery matters, including review of response in opposition to motion for partial summary judgment and correspondence with opposing counsel regarding claw back request
Craig, Laura K.	2/3/2022	0.30	
Bonacorsi, Lauri A.	2/3/2022	0.70	Conduct analysis of Defendants' 56.1 statement of facts
Bonacorsi, Lauri A.	2/3/2022	1.40	Assist D. Hay and L. Mulherin in preparation of drafting reply brief
Ballard, Emma A.	2/3/2022	1.10	Assist L. Bonacorsi with creating binder for opposition to partial summary judgment
Hay, Daniel J.	2/4/2022	1.00	Draft reply in support of motion for summary judgment
Hay, Daniel J.	2/4/2022	0.40	Meet with C. Pujol re Thruway inventory map, and prepare for same
Hay, Daniel J.	2/4/2022	2.50	Draft summary judgment reply
Hay, Daniel J.	2/4/2022	0.70	Draft response to Defendants' February 4 filing
			Attention to preparing reply, including preparation of response to statement of undisputed material facts
Craig, Laura K.	2/4/2022	0.80	
Bonacorsi, Lauri A.	2/4/2022	0.50	Analysis of Defendants' response to Plaintiff's statement of undisputed facts
Bonacorsi, Lauri A.	2/4/2022	2.00	Conduct research relating to Defendants' equitable defenses
Bonacorsi, Lauri A.	2/4/2022	3.50	Draft responses to Defendants' additional statements of facts
Bonacorsi, Lauri A.	2/4/2022	0.50	Revisions to draft Reply brief
Ballard, Emma A.	2/4/2022	0.20	Assist L. Bonacorsi with NR relativity
Hay, Daniel J.	2/5/2022	0.40	Revise response to Defendants' 2/4 submission based on comments from G. Todd
			Research and summarize factual misstatements in defendants' letter to court regarding discovery matters
Craig, Laura K.	2/5/2022	0.50	
Bonacorsi, Lauri A.	2/5/2022	5.40	Edits to Reply brief draft, focusing on addressing gaps in draft
Todd, Gordon D.	2/5/2022	0.40	Review and revise draft letter to Court regarding inaccuracies in City's letter
Rody, David M.	2/5/2022	0.50	Review and comment on NR opposition to MSJ
			Attention to preparing draft letter to Court regarding discovery issues, including review of draft letter, research regarding dispute time line, and call with D. Hay regarding same
Craig, Laura K.	2/6/2022	1.30	
Craig, Laura K.	2/6/2022	0.50	Draft response to statement of undisputed material facts
Bonacorsi, Lauri A.	2/6/2022	1.60	Edits to Reply brief draft, focusing on filling in gaps
Bonacorsi, Lauri A.	2/6/2022	1.40	Draft responses to Defendants' additional statement of facts
Rody, David M.	2/6/2022	0.30	Review and comment on draft letter to court re: discovery
Hay, Daniel J.	2/7/2022	0.40	Revise and serve response to Defendants' February 4 letter
Hay, Daniel J.	2/7/2022	0.30	Meet and confer re interrogatory responses
Hay, Daniel J.	2/7/2022	1.00	Prepare for status conference
Hay, Daniel J.	2/7/2022	1.50	Revise response to Defendants' statement of additional facts
			Attention to discovery matters, including finalizing draft letter regarding privilege log issues, review of Defendants' RFA responses, and preparation of production log
Craig, Laura K.	2/7/2022	0.90	
			Attention to preparing reply in support of motion for summary judgment, including drafting responses to Defendants' statements of undisputed material facts
Craig, Laura K.	2/7/2022	1.40	
Craig, Laura K.	2/7/2022	0.40	Meet and confer with opposing counsel regarding discovery matters
Bonacorsi, Lauri A.	2/7/2022	0.30	Analysis of CCO interrogatories in assessing appropriate response to Defendants' letter to court
Bonacorsi, Lauri A.	2/7/2022	0.90	Research related to responding to statements of fact
Bonacorsi, Lauri A.	2/7/2022	1.00	Edits to Reply brief draft with focus on citations to record
Rody, David M.	2/7/2022	0.40	Correspondence with Sidley team re: letter to court on NR's discovery deficiencies
Hay, Daniel J.	2/8/2022	1.90	Revise summary judgment reply
Hay, Daniel J.	2/8/2022	0.30	Review case law on equitable estoppel
Hay, Daniel J.	2/8/2022	1.00	Interview of I. Shepherd
Hay, Daniel J.	2/8/2022	0.80	Review and revise response to Defendants' statement of additional facts
Hay, Daniel J.	2/8/2022	1.50	Prepare for, attend, and debrief status conference
			Attention to preparing reply in support of motion for summary judgment, including revising response to statement of undisputed material facts, drafting section of reply (including research regarding
Craig, Laura K.	2/8/2022	3.80	
Bonacorsi, Lauri A.	2/8/2022	3.70	Assist in finalizing Reply brief, focusing on support for assertions from record
Ballard, Emma A.	2/8/2022	0.70	Update production log with production dates
Todd, Gordon D.	2/8/2022	1.00	Interview with I. Shepherd
Hay, Daniel J.	2/9/2022	0.70	Revise response to statement of additional facts
Hay, Daniel J.	2/9/2022	0.20	Draft email to D. Rody summarizing call with I. Shepherd
Craig, Laura K.	2/9/2022	0.30	Call with D. Hay regarding ongoing work streams
			Attention to drafting reply in support of motion for summary judgment, including drafting supplemental declaration and revising brief
Craig, Laura K.	2/9/2022	2.00	
Bonacorsi, Lauri A.	2/9/2022	0.80	Assist in locating record support for Reply brief
Bonacorsi, Lauri A.	2/9/2022	0.80	Assist with deciding appropriate exhibits for Reply
Craig, Laura K.	2/10/2022	2.00	Attention to discovery matters, including review of documents and drafting Exhibit A acknowledgment
Bonacorsi, Lauri A.	2/10/2022	0.10	Assist in locating factual support for Reply brief
Bonacorsi, Lauri A.	2/10/2022	0.50	Draft request for oral argument
Hay, Daniel J.	2/11/2022	2.10	Review D. Rody's revisions to summary judgment reply brief and Rule 56.1 statement
Craig, Laura K.	2/11/2022	0.20	Review confidentiality designations in defendants' productions
			Review draft filings for reply, including request for oral argument and D. Rody comments to brief and statement of undisputed material facts
Craig, Laura K.	2/11/2022	0.30	

Craig, Laura K.	2/11/2022	0.10	Call with D. Hay regarding discovery matters
Bonacorsi, Lauri A.	2/11/2022	0.60	Draft request for oral argument
Bonacorsi, Lauri A.	2/11/2022	0.10	Review revisions to response to statement of facts
Bonacorsi, Lauri A.	2/11/2022	2.20	Conduct factual searches related to billboard locations and prospective deponents for D. Hay
Rody, David M.	2/11/2022	2.70	Review, revise, and comment on draft reply brief and statement of facts
Hay, Daniel J.	2/12/2022	0.50	Research response to New Rochelle's equitable estoppel defense
Todd, Gordon D.	2/13/2022	0.50	Review and revised draft reply brief i/s/o motion for partial summary judgment
Hay, Daniel J.	2/14/2022	2.30	Revise summary judgment reply filings based on comments from G. Todd
			Attention to discovery matters, including review of revised privilege log and finalizing reply and call with L. Bonacorsi regarding same
Craig, Laura K.	2/14/2022	1.10	Finalize Reply documents to be filed in anticipation of K. Mawdsley citation and record check by making updates to all documents and compiling exhibits from present and prior filings
Todd, Gordon D.	2/14/2022	2.80	Review and revised draft reply brief i/s/o motion for partial summary judgment
Hay, Daniel J.	2/15/2022	0.30	Revise Rule 30(b)(6) notice to New Rochelle
Hay, Daniel J.	2/15/2022	1.60	Review supplemental privilege log
Hay, Daniel J.	2/15/2022	0.40	Call with L. Mulherin re in camera review challenges
Hay, Daniel J.	2/15/2022	1.80	Revise summary judgment brief
			Prepare draft Table of Authorities, cite-check, and proofread reply in support of motion for partial summary judgment
Mawdsley, Karen A.	2/15/2022	8.30	
Mawdsley, Karen A.	2/15/2022	1.20	Cite-check response to additional statements of material fact
			Attention to discovery matters, including review of reply and review of privileged documents for potential in camera review and call with D. Hay regarding same
Craig, Laura K.	2/15/2022	2.10	Work on motion to seal parts of record, including review of record to check confidentiality status
Bonacorsi, Lauri A.	2/15/2022	1.00	Revisions to Reply brief in support of partial motion for summary judgment
Bonacorsi, Lauri A.	2/15/2022	1.10	Analyze latest New Rochelle document production
Rody, David M.	2/15/2022	0.30	Correspondence with Sidley team and NR counsel re: deposition schedule
Rody, David M.	2/15/2022	0.30	Correspondence with Sidley team and client re: billboard permit issues
Rody, David M.	2/15/2022	0.30	Review final draft of reply MSJ brief
Hay, Daniel J.	2/16/2022	0.50	Review final packet of documents for filing summary judgment reply
Craig, Laura K.	2/16/2022	0.90	Prepare and finalize filings for reply in support of motion for partial summary judgment
			Correspondence regarding in camera review of documents and plan for reviewing additional documents with D. Hay
Craig, Laura K.	2/16/2022	0.10	
Bonacorsi, Lauri A.	2/16/2022	0.90	Prepare courtesy copy of partial motion for summary judgment filing to be sent to A. Krause
Bonacorsi, Lauri A.	2/16/2022	0.60	Finalize exhibits for partial motion for summary judgment reply filing
Bonacorsi, Lauri A.	2/16/2022	0.50	Analyze document from New Rochelle production in anticipation of future stages of litigation
Ballard, Emma A.	2/16/2022	0.50	Assist L. Mulherin with preparing PO acknowledgments for potential deponents
Rody, David M.	2/16/2022	0.50	Correspondence with Sidley team, client and NR counsel re: deposition scheduling
			Attention to discovery matters, including review of summary of New Rochelle production and correspondence regarding deposition dates
Craig, Laura K.	2/17/2022	0.20	
Bonacorsi, Lauri A.	2/17/2022	0.40	Prepare summary of certain documents from discovery for D. Hay and L. Mulherin
Bonacorsi, Lauri A.	2/17/2022	0.20	Assist with scheduling depositions
			Call and subsequent correspondence with J. Nonkes regarding documents selected for in camera review
Craig, Laura K.	2/18/2022	0.20	
Craig, Laura K.	2/20/2022	0.10	Correspond with L. Bonacorsi regarding updating deposition notice
Bonacorsi, Lauri A.	2/21/2022	0.30	Assist in scheduling depositions, including updating deposition notice
Bonacorsi, Lauri A.	2/22/2022	0.10	Update notice of deposition with newly scheduled events
Rody, David M.	2/22/2022	0.30	Correspondence with Sidley team and NR counsel re: depositions
Hay, Daniel J.	2/24/2022	0.70	Revise Rule 30(b)(6) deposition notice
			Attention to discovery matters, including correspondence with Veritext regarding locations and correspondence with D. Hay regarding preparation
Craig, Laura K.	2/25/2022	0.10	
Bonacorsi, Lauri A.	2/25/2022	1.10	Analyze latest New Rochelle production of K. Gill custodian documents
Bonacorsi, Lauri A.	2/26/2022	2.00	Analyze K. Gill documents from NR production for relevance to litigation
Bonacorsi, Lauri A.	2/27/2022	0.90	Analysis of K. Gill custodian documents in latest NR production for relevance to litigation
Bonacorsi, Lauri A.	2/28/2022	1.10	Finalize analysis of K. Gill custodian documents from latest NR production
Hay, Daniel J.	3/1/2022	0.80	Prepare deposition notices and subpoenas for New Rochelle's witnesses
Craig, Laura K.	3/1/2022	0.10	Review and update Aragon deposition subpoena
Bonacorsi, Lauri A.	3/1/2022	0.10	Update notice of deposition based on recent scheduling
Rody, David M.	3/1/2022	0.20	Correspondence with Sidley team re: depositions and discovery issues
Hay, Daniel J.	3/2/2022	0.80	Review and comment on deposition outline for N. Bramson
			Attention to discovery matters, including review of K. Gill key documents correspondence regarding same with D. Hay and L. Bonacorsi
Craig, Laura K.	3/2/2022	0.30	
Bonacorsi, Lauri A.	3/2/2022	0.40	Update Master Chronology with key K. Gill documents
Bonacorsi, Lauri A.	3/2/2022	0.10	Update notice of deposition with newly scheduled events
Bonacorsi, Lauri A.	3/2/2022	0.90	Prepare summary of key K. Gill documents for G. Todd
Rody, David M.	3/2/2022	0.20	Correspondence with Sidley team and NR counsel re: depositions
Bonacorsi, Lauri A.	3/3/2022	0.10	Assist in deposition scheduling
Rody, David M.	3/3/2022	0.80	Review and revise Bramson interview outline
Rody, David M.	3/4/2022	1.50	Review and comment on Bramson deposition materials and revisions to outline
Rody, David M.	3/4/2022	0.30	Correspondence with Sidley team and NR counsel re: depositions
Bonacorsi, Lauri A.	3/6/2022	0.10	Update notice of deposition based on scheduling changes
Hay, Daniel J.	3/7/2022	2.40	Prepare for deposition of TRA
Bonacorsi, Lauri A.	3/7/2022	3.30	Assist in preparation for A. Salgado deposition by summarizing pertinent documents for D. Hay
Hay, Daniel J.	3/8/2022	0.90	Revise letter motion to compel interrogatory responses
Craig, Laura K.	3/8/2022	1.20	Draft motion to compel interrogatory responses
Bonacorsi, Lauri A.	3/8/2022	3.40	Prepare deposition preparation materials for A. Salgado deposition, including locating key documents

Hay, Daniel J.	3/9/2022	3.80	Outline deposition of TRA
Craig, Laura K.	3/9/2022	0.60	Revise motion to compel
Bonacorsi, Lauri A.	3/9/2022	1.00	Arrange key A. Salgado documents in anticipation of deposition
Bonacorsi, Lauri A.	3/9/2022	0.40	Review TRA deposition outline
Ballard, Emma A.	3/9/2022	0.90	Assist L. Bonacorsi with creating a binder for deposition preparation
Rody, David M.	3/9/2022	0.50	Review and comment on letter to court seeking to compel discovery
Hay, Daniel J.	3/10/2022	0.20	Revise pre-motion letter re interrogatory responses
Hay, Daniel J.	3/10/2022	0.60	Prepare for deposition of TRA
			Attention to discovery work streams, including finalizing and filing motion to compel and revising TRA deposition outline
Craig, Laura K.	3/10/2022	1.00	
Bonacorsi, Lauri A.	3/10/2022	0.30	Assist in making adjustments due to deposition scheduling changes
Bonacorsi, Lauri A.	3/10/2022	4.10	Prepare TRA deposition exhibits
Bonacorsi, Lauri A.	3/10/2022	0.70	Conduct further review of TRA deposition outline in anticipation of deposition
Rody, David M.	3/10/2022	0.20	Correspondence with Sidley team re: final motion to compel discovery
Craig, Laura K.	3/11/2022	1.40	Revise N. Bramson deposition outline, including call with D. Rody regarding same
			Assist in deposition preparation, including preparing list of key individuals in litigation and summarizing their relevance
Bonacorsi, Lauri A.	3/11/2022	1.20	
Rody, David M.	3/11/2022	1.00	Conferences and correspondence with Sidley team re: Bramson deposition outline and exhibits
Craig, Laura K.	3/12/2022	2.10	Draft N. Bramson deposition outline
Hay, Daniel J.	3/13/2022	0.80	Revise Bramson deposition outline
Hay, Daniel J.	3/13/2022	1.60	Revise TRA deposition outline
Craig, Laura K.	3/13/2022	0.30	Finalize draft outline for Bramson deposition
Bonacorsi, Lauri A.	3/13/2022	1.80	Identify key individuals in litigation to assist with deposition preparation
Bonacorsi, Lauri A.	3/13/2022	2.30	Work on finalizing exhibits for TRA deposition
Ballard, Emma A.	3/13/2022	0.50	Prepare exhibits for upcoming deposition
Hay, Daniel J.	3/14/2022	2.50	Review exhibits and revise outline to prepare for TRA deposition
			Attention to deposition preparation, including revising key player's list and finalizing N. Bramson preparation deposition materials
Craig, Laura K.	3/14/2022	0.80	
Bonacorsi, Lauri A.	3/14/2022	1.10	Analyze relevance of key individuals in litigation to assist with deposition preparation
Ballard, Emma A.	3/14/2022	0.90	Create binder of exhibits and key documents for upcoming deposition
Hay, Daniel J.	3/15/2022	1.50	Review and draft reply to New Rochelle's response to discovery letter
Hay, Daniel J.	3/15/2022	0.60	Prepare for TRA deposition
Hay, Daniel J.	3/15/2022	0.40	Call with L. Bonacorsi re TRA deposition preparation
Hay, Daniel J.	3/15/2022	1.00	Prepare for Salgado deposition
			Attention to discovery matters, including review of TRA deposition outline, review of draft letter to court regarding discovery issues, and call with D. Hay regarding same
Craig, Laura K.	3/15/2022	0.90	
Bonacorsi, Lauri A.	3/15/2022	1.20	Assist with deposition preparation for Moritz deposition, including preparing the exhibits
Bonacorsi, Lauri A.	3/15/2022	0.40	Call with D. Hay to plan Moritz deposition
Rody, David M.	3/15/2022	0.30	Review and revise letter in reply to Harris Beach response
Rody, David M.	3/15/2022	0.20	Correspondence with Sidley team re: upcoming depositions
Rody, David M.	3/15/2022	0.20	Review and comment on Harris Beach response to Sidley discovery letter
Rody, David M.	3/15/2022	0.30	Correspondence and conferences with Sidley team re: response to NR letter to court
Hay, Daniel J.	3/16/2022	0.70	Prepare for TRA deposition
Bonacorsi, Lauri A.	3/16/2022	0.80	Assist in deposition preparation by researching potential relevant privilege matters
Rody, David M.	3/16/2022	0.40	Correspondence with Sidley team re: depositions and discovery issues
Hay, Daniel J.	3/17/2022	3.10	Prepare for TRA deposition
Craig, Laura K.	3/17/2022	0.30	Attend meet and confer with D. Hay and opposing counsel
Bonacorsi, Lauri A.	3/17/2022	1.00	Final preparation for Moritz deposition, including finalizing exhibits
Rody, David M.	3/17/2022	0.30	Correspondence and conferences with Sidley team re: depositions and discovery issues
Hay, Daniel J.	3/18/2022	7.00	Prepare for and take deposition of TRA
			Attention to discovery matters, including updating and serving deposition notice, correspondence regarding deposition scheduling
Craig, Laura K.	3/18/2022	0.50	
Rody, David M.	3/18/2022	0.50	Conferences and correspondence with Sidley team re: deposition progress and strategy
Craig, Laura K.	3/20/2022	0.30	Attention to preparing deposition preparation materials and exhibits
Bonacorsi, Lauri A.	3/20/2022	2.00	Prepare summary of L. Moritz deposition key points for G. Todd and D. Rody
Ballard, Emma A.	3/20/2022	0.20	Create exhibits for upcoming deposition
Rody, David M.	3/20/2022	2.50	Review and revise Bramson interview outline and exhibits
Hay, Daniel J.	3/21/2022	0.40	Call with D. Rody re preparation for Bramson deposition
Hay, Daniel J.	3/21/2022	0.20	Call with L. Mulherin re Bramson and Wayner deposition prep
Hay, Daniel J.	3/21/2022	0.50	Call with G. Todd, D. Rody, L. Mulherin re deposition prep planning
			Attention to deposition preparation, including preparation of N. Bramson deposition exhibits and remote deposition stipulation
Craig, Laura K.	3/21/2022	0.80	
Bonacorsi, Lauri A.	3/21/2022	0.40	Assist in L. Aragon deposition preparation by compiling key documents
Bonacorsi, Lauri A.	3/21/2022	1.00	Prepare video exhibits for Bramson deposition
Bonacorsi, Lauri A.	3/21/2022	0.20	Provide summary of key points from Moritz deposition for D. Rody and G. Todd
Ballard, Emma A.	3/21/2022	0.10	Assist L. Mulherin with printing exhibits for deposition
Rody, David M.	3/21/2022	1.20	Review materials to prepare for Bramson interview
Rody, David M.	3/21/2022	0.80	Correspondence and conferences with Sidley team re: deposition planning, preparation, and strategy
Hay, Daniel J.	3/22/2022	0.60	Prepare exhibits for Bramson deposition
Craig, Laura K.	3/22/2022	0.60	Review and revise N. Bramson deposition outline
Bonacorsi, Lauri A.	3/22/2022	0.40	Assist in preparing remote deposition protocol
Bonacorsi, Lauri A.	3/22/2022	1.60	Assist in N. Bramson deposition preparation, including helping prepare video exhibit
Bonacorsi, Lauri A.	3/22/2022	1.30	Assist with L. Aragon deposition preparation by analyzing key documents
Rody, David M.	3/22/2022	0.50	Correspondence and conferences with Sidley team re: deposition prep and strategy
Rody, David M.	3/22/2022	0.50	Prepare for Bramson deposition

Bonacorsi, Lauri A.	3/23/2022	3.00	L. Aragon deposition preparation, including preparing key documents for G. Todd review
Ballard, Emma A.	3/23/2022	0.50	Assist L.Bonacorsi with adjusting file names to reflect chronology of documents
Rody, David M.	3/23/2022	4.50	Prepare for and conduct deposition of N. Bramson
Craig, Laura K.	3/24/2022	0.20	Correspondence with opposing counsel regarding remote deposition
			Assist in preparation of H. Coghlan deposition by analyzing key documents for inclusion in preparation materials
Bonacorsi, Lauri A.	3/24/2022	2.00	
Rody, David M.	3/24/2022	0.50	Correspondence with Sidley team re: deposition planning and strategy
Hay, Daniel J.	3/25/2022	0.80	Call with E. Herman and A. Helf, and follow up call with G. Todd, re expert report
Hay, Daniel J.	3/25/2022	0.40	Compile information and documents for valuation expert
Craig, Laura K.	3/25/2022	0.70	Assist with deposition preparation
Bonacorsi, Lauri A.	3/25/2022	2.70	Finalize L. Aragon deposition materials for G. Todd
Bonacorsi, Lauri A.	3/25/2022	2.10	Prepare H. Coghlan deposition preparation materials
Ballard, Emma A.	3/25/2022	3.20	Create and ship out two binders of key documents for upcoming depositions
Todd, Gordon D.	3/25/2022	0.30	Call with sign valuation experts
Rody, David M.	3/25/2022	0.40	Correspondence with Sidley team and NR counsel re: depositions and remote protocol
Hay, Daniel J.	3/27/2022	1.10	Prepare outline for deposition prep with H. Coughlan
Craig, Laura K.	3/27/2022	1.10	Prepare for A. Wayner deposition, including drafting outline and review of documents
Bonacorsi, Lauri A.	3/27/2022	0.10	Prepare H. Coghlan deposition preparation materials
Bonacorsi, Lauri A.	3/27/2022	0.70	Make updates to L. Aragon deposition preparation materials
Rody, David M.	3/27/2022	0.80	Correspondence with Sidley team re: deposition planning and strategy
Hay, Daniel J.	3/28/2022	2.50	Prepare for and meet with H. Coghlan re deposition preparation
Craig, Laura K.	3/28/2022	4.60	Prepare for A. Wayner deposition, including finalizing exhibit set and drafting outline
Bonacorsi, Lauri A.	3/28/2022	0.50	Make final edits to L. Aragon deposition materials
Ballard, Emma A.	3/28/2022	0.80	Prepare binder of key documents for upcoming deposition
Todd, Gordon D.	3/28/2022	2.40	Deposition prep session with H. Coughlan
Rody, David M.	3/28/2022	0.60	Correspondence and conferences with Sidley team re: H. Coghlan deposition
Rody, David M.	3/28/2022	2.80	Review documents to prepare for, and attend, H. Coghlan deposition prep session
Rody, David M.	3/28/2022	0.60	Correspondence and conferences with Sidley team and NR counsel re: upcoming depositions
Hay, Daniel J.	3/29/2022	0.60	Draft questions for deposition of L. Aragon
Hay, Daniel J.	3/29/2022	0.50	Review and revise outline for Wayner deposition
Hay, Daniel J.	3/29/2022	0.90	Call with L. Mulherin re Wayner deposition
Hay, Daniel J.	3/29/2022	1.80	Review and respond to supplemental summary judgment filing by New Rochelle
Reilly, Ally N.	3/29/2022	1.50	Prepare binders of exhibits sets for L. Mulherin and L. Bonacorsi
Craig, Laura K.	3/29/2022	4.10	Prepare for A. Wayner deposition, including call with D. Hay regarding outline
Bonacorsi, Lauri A.	3/29/2022	1.20	Provide summary of takeaways from Defendants' amended RFP responses
Bonacorsi, Lauri A.	3/29/2022	1.00	Prepare compilation of Defendants' discovery responses for G. Todd
Bonacorsi, Lauri A.	3/29/2022	0.40	Review A. Wayner deposition outline for L. Mulherin
Bonacorsi, Lauri A.	3/29/2022	0.70	Research legal question related to L. Aragon deposition for G. Todd preparation
Bonacorsi, Lauri A.	3/29/2022	0.40	Finalize Coghlan deposition preparation materials
Ballard, Emma A.	3/29/2022	1.40	Create binder of New Rochelle discovery responses for L.Bonacorsi and L.Mulherin
Todd, Gordon D.	3/29/2022	5.50	Review documents in preparation for Aragon deposition
Rody, David M.	3/29/2022	1.20	Correspondence with Sidley team re: deposition prep and planning
Rody, David M.	3/29/2022	0.80	Correspondence and conferences with Sidley team re: NR filing and case strategy
Hay, Daniel J.	3/30/2022	0.50	Revise response to New Rochelle's sur-reply
Craig, Laura K.	3/30/2022	6.40	Prepare for, take A. Wayner deposition, and conduct follow up work regarding
Bonacorsi, Lauri A.	3/30/2022	0.80	Research legal theory that relates to L. Aragon deposition for G. Todd
Bonacorsi, Lauri A.	3/30/2022	1.80	Provide analysis of relevant video to deposition preparation for G. Todd
Todd, Gordon D.	3/30/2022	4.80	Review documents in preparation for H. Coughlan deposition prep and deposition
Todd, Gordon D.	3/30/2022	0.80	Review and revise draft letter opposition to MJ Krause responding to City's sur reply letter on summary judgment motion
Rody, David M.	3/30/2022	0.80	Correspondence and conferences with Sidley team re: preparations and strategy for upcoming depositions
Craig, Laura K.	3/31/2022	0.60	Attention to deposition preparation for H. Coghlan defense and L. Aragon deposition
Bonacorsi, Lauri A.	3/31/2022	0.10	Arrange for deposition exhibit to be prepared
Todd, Gordon D.	3/31/2022	1.00	Call with I. Shephard regarding New Rochelle
Todd, Gordon D.	3/31/2022	2.00	Continue to prepare for L. Aragon deposition
Todd, Gordon D.	3/31/2022	6.50	Prepare for and participate in H. Coughlan deposition prep session
Rody, David M.	3/31/2022	1.20	Conferences and correspondence with Sidley team re: strategy and preparations for H. Coghlan and L. Aragon depositions
Rody, David M.	3/31/2022	1.00	Review H. Coghlan witness prep materials
Rody, David M.	3/31/2022	2.70	Conduct witness prep session with G. Todd for H. Coghlan
Hay, Daniel J.	4/1/2022	0.40	Draft talking points for status conference
Hay, Daniel J.	4/1/2022	1.50	Prepare for and attend status conference
Hay, Daniel J.	4/1/2022	0.20	Call with L. Mulherin re deposition planning and responding to court's status conference order
Craig, Laura K.	4/1/2022	1.30	Attention to discovery matters
Todd, Gordon D.	4/1/2022	4.80	Continue to prepare for L. Aragon deposition
Todd, Gordon D.	4/1/2022	5.50	Prepare for and participate in defense of H. Coughlan deposition
Rody, David M.	4/1/2022	0.40	Conferences and correspondence with Sidley team re: strategy and preparations for depositions
Rody, David M.	4/1/2022	0.80	Call with court and all parties re: privilege and discovery issues
Craig, Laura K.	4/3/2022	1.50	Assist with deposition preparation
Bonacorsi, Lauri A.	4/3/2022	1.90	Assist with deposition preparation, including preparing L. Aragon exhibits
Todd, Gordon D.	4/3/2022	2.50	Continue to prepare for L. Aragon deposition
Reilly, Ally N.	4/4/2022	1.00	Assist in preparation of exhibit documents for L. Mulherin

Craig, Laura K.	4/4/2022	4.70	Assist with deposition preparation, including fact investigation and preparation of materials for L. Aragon deposition
Bonacorsi, Lauri A.	4/4/2022	4.80	Prepare L. Aragon deposition exhibits for G. Todd
Bonacorsi, Lauri A.	4/4/2022	0.90	Assist with preparing potential video exhibits for L. Aragon deposition, including locating key portions of videos
Ballard, Emma A.	4/4/2022	0.50	Assist L. Bonacorsi with preparing documents
Todd, Gordon D.	4/4/2022	5.60	Prepare for Aragon deposition
Rody, David M.	4/4/2022	0.50	Correspondence with Sidley team re: strategy and preparations for depositions
Hay, Daniel J.	4/5/2022	0.30	Follow up research from Aragon deposition
Craig, Laura K.	4/5/2022	0.50	Assist with deposition preparation
Bonacorsi, Lauri A.	4/5/2022	3.50	Assist with deposition preparation including analysis of J. King documents
Todd, Gordon D.	4/5/2022	7.50	Prepare for and take L. Aragon deposition
Rody, David M.	4/5/2022	0.50	Correspondence and conference with Sidley team re: Aragon deposition
Hay, Daniel J.	4/6/2022	0.30	Communicate with expert and litigation team re report deadline
Craig, Laura K.	4/6/2022	4.10	Assist with J. King deposition preparation
Bonacorsi, Lauri A.	4/6/2022	7.40	Prepare J. King deposition preparation materials, including identifying key documents needed for preparation
Ballard, Emma A.	4/6/2022	2.00	Assist L. Mulherin and L. Bonacorsi with preparing binders for deposition
Todd, Gordon D.	4/6/2022	3.50	Review documents in advance of J. King deposition prep
Rody, David M.	4/6/2022	0.50	Correspondence and conference with Sidley team and Harris Beach re: depositions
Craig, Laura K.	4/7/2022	3.70	Attend and prepare for J. King deposition preparation session
Craig, Laura K.	4/7/2022	0.10	Call with G. Todd regarding J. King deposition preparation
Craig, Laura K.	4/7/2022	0.70	Research regarding mediation requirements in SDNY
Bonacorsi, Lauri A.	4/7/2022	0.70	Begin work on 30(b)(6) preparation of deposition materials
Todd, Gordon D.	4/7/2022	2.50	J. King deposition prep
Todd, Gordon D.	4/7/2022	2.20	Review documents in advance of J. King deposition prep
Craig, Laura K.	4/8/2022	3.60	Prepare letter filing regarding motion for privilege sanctions, including analysis of New Rochelle's privilege logs
Craig, Laura K.	4/8/2022	0.50	Call with D. Hay and L. Bonacorsi regarding 30(b)(6) preparation
Bonacorsi, Lauri A.	4/8/2022	0.80	Work on 30(b)(6) deposition preparation materials, including analysis of key documents
Bonacorsi, Lauri A.	4/10/2022	4.80	Prepare key deposition preparation materials for H. Coghlan deposition
Craig, Laura K.	4/11/2022	0.40	Call with L. Bonacorsi regarding 30(b)(6) preparation
Craig, Laura K.	4/11/2022	1.00	Assist with 30(b)(6) deposition preparation
Bonacorsi, Lauri A.	4/11/2022	0.50	Call with L. Mulherin regarding deposition preparation for 30(b)(6)
Bonacorsi, Lauri A.	4/11/2022	1.80	Make updates to 30(b)(6) deposition preparation materials and organization
Craig, Laura K.	4/12/2022	3.70	Assist with deposition preparation, including draft mock cross for J. King and research regarding Aragon deposition testimony
Ballard, Emma A.	4/12/2022	0.70	Organize e-binder for L. Mulherin for upcoming deposition
Rody, David M.	4/12/2022	1.00	Correspondence with Sidley team re: deposition progress and strategy
Hay, Daniel J.	4/13/2022	1.00	Review letter to court re sanctions motion and in camera review
Craig, Laura K.	4/13/2022	4.60	Assist with J. King deposition preparation, including preparation for and attending meeting with J. King and post-meeting internal discussion
Craig, Laura K.	4/13/2022	0.50	Revise supplemental letter filing regarding sanctions motion
Bonacorsi, Lauri A.	4/13/2022	1.80	Prepare deposition preparation materials, including analysis of key documents for 30(b)(6)
Ballard, Emma A.	4/13/2022	2.00	Assist L. Bonacorsi with prepping binders for 30(b)(6) preparation
Todd, Gordon D.	4/13/2022	5.00	Prepare J. King for deposition
Rody, David M.	4/13/2022	0.30	Correspondence with Sidley team and NR counsel re: depositions
Hay, Daniel J.	4/14/2022	0.50	Revise letter to court re discovery sanctions
Craig, Laura K.	4/14/2022	5.10	Attend and prepare for J. King deposition, including internal discussions
Bonacorsi, Lauri A.	4/14/2022	0.10	Finalize 30(b)(6) deposition preparation materials
Todd, Gordon D.	4/14/2022	0.40	Correspondence with City counsel and S. Llach regarding possible mediation
Rody, David M.	4/14/2022	0.20	Review and revise letter to court on discovery sanctions
Craig, Laura K.	4/15/2022	0.50	Finalize draft supplemental filing regarding sanctions motion
Bonacorsi, Lauri A.	4/15/2022	0.40	Assist with organization of deposition preparation materials
Rody, David M.	4/15/2022	0.20	Review filing with magistrate judge
Craig, Laura K.	4/18/2022	1.00	Draft letter motion to court regarding extending schedule
Rody, David M.	4/18/2022	0.80	Review 30(b)(6) deposition prep materials
Rody, David M.	4/18/2022	0.40	Review and comment on discovery letter to court by NR counsel
Rody, David M.	4/18/2022	0.60	Correspondence with Sidley team and NR counsel re: deposition schedule
Craig, Laura K.	4/19/2022	0.30	Finalize and file scheduling motion
Rody, David M.	4/19/2022	0.30	Correspondence with Sidley team and all counsel re: discovery schedule changes
Craig, Laura K.	4/20/2022	0.20	Review L. Aragon deposition transcript
Rody, David M.	4/20/2022	0.30	Correspondence with Sidley team re: Aragon deposition
Rody, David M.	4/21/2022	1.00	Review and analyze documents marked "key" by review team
Rody, David M.	4/21/2022	0.20	Correspondence with Sidley team re: Aragon post-deposition strategy
Craig, Laura K.	4/22/2022	0.30	Review City of Austin decision
Rody, David M.	4/25/2022	0.20	Correspondence with Sidley team re: Rule 30(b)(6) notice
Hay, Daniel J.	4/26/2022	0.50	Revise and serve amended Rule 30(b)(6) notice
Rody, David M.	4/26/2022	0.20	Correspondence with Sidley team and NR counsel re: depositions
Craig, Laura K.	4/27/2022	0.40	Prepare collection of deposition transcripts for G. Todd
Bonacorsi, Lauri A.	4/27/2022	0.10	Assist with compiling deposition transcripts for G. Todd
Craig, Laura K.	5/1/2022	0.60	Research regarding 30(b)(6) disclosure requirements
Todd, Gordon D.	5/1/2022	4.20	Review deposition transcripts for N. Bramson and TRA
Hay, Daniel J.	5/2/2022	0.40	Call with G. Todd and D. Rody re Schwartz deposition and follow up call with B. Katz re same
Bonacorsi, Lauri A.	5/2/2022	0.50	Conduct research on procedural rules for discovery for D. Hay

Todd, Gordon D.	5/2/2022	0.30	Confer with D. Hay, D. Rody regarding M. Schwartz deposition issue
Rody, David M.	5/2/2022	0.50	Correspondence and conferences with Sidley team re: deposition strategy
Hay, Daniel J.	5/3/2022	0.20	Meet and confer regarding TRA documents
Craig, Laura K.	5/3/2022	0.60	Prepare for meet and confer regarding privilege log entries
Craig, Laura K.	5/3/2022	1.70	Research regarding discovery rules related to 30(b)(6) witnesses and initial disclosures
Hay, Daniel J.	5/4/2022	0.20	Call with L. Mulherin re discovery and research for depositions
Hay, Daniel J.	5/4/2022	0.40	Meet and confer re lease trackers
Craig, Laura K.	5/4/2022	0.60	Attend meet and confer with J. Nonkes and D. Hay, including post-call with D. Hay
Craig, Laura K.	5/4/2022	1.10	Legal research regarding discovery issues
Craig, Laura K.	5/5/2022	2.70	Attention to discovery matters, including legal research regarding privilege matters
Bonacorsi, Lauri A.	5/5/2022	0.20	Review latest production of documents from third party
Todd, Gordon D.	5/5/2022	0.30	Review research regarding witness disclosure requirement with regard to M. Schwartz
			Review research into production of documents used to refresh witness recollection during 30(b)(6) deposition
Todd, Gordon D.	5/5/2022	0.40	
Rody, David M.	5/5/2022	0.20	Correspondence with Sidley team re: deposition strategy and planning
Craig, Laura K.	5/6/2022	0.10	Attention to deposition scheduling matters
Bonacorsi, Lauri A.	5/6/2022	0.50	Analyze latest production of documents received
Bonacorsi, Lauri A.	5/7/2022	2.00	Prepare analysis of key C. Strome documents in anticipation of deposition
Bonacorsi, Lauri A.	5/8/2022	2.60	Assist with deposition preparation of C. Strome including preparing materials
Hay, Daniel J.	5/9/2022	0.50	Confer with L. Mulherin re 30(b)(6) deposition prep
Craig, Laura K.	5/9/2022	0.50	Meeting with D. Hay regarding discovery planning
Rody, David M.	5/9/2022	0.20	Correspondence with Sidley team and NR counsel re: depositions
Craig, Laura K.	5/10/2022	0.10	Correspondence regarding New Rochelle 30(b)(6) deposition planning
Craig, Laura K.	5/11/2022	0.10	Correspondence regarding deposition scheduling matters
Todd, Gordon D.	5/11/2022	4.50	Review A. Waynor deposition transcript
Rody, David M.	5/11/2022	0.20	Correspondence with Sidley team re: deposition planning
Craig, Laura K.	5/12/2022	0.50	Review deposition preparation materials for C. Strome deposition
Bonacorsi, Lauri A.	5/12/2022	0.20	Conduct research for preparation of C. Strome deposition
Bonacorsi, Lauri A.	5/12/2022	2.00	Conduct analysis of production from New Rochelle
Craig, Laura K.	5/13/2022	0.20	Draft and serve revised notice of depositions
Bonacorsi, Lauri A.	5/13/2022	3.40	Analyze latest production of documents from New Rochelle
Bonacorsi, Lauri A.	5/13/2022	0.10	Assist in scheduling of depositions
Bonacorsi, Lauri A.	5/14/2022	0.40	Summarize documents related to C. Strome in anticipation of deposition
Bonacorsi, Lauri A.	5/14/2022	1.40	Summarize analysis of New Rochelle's latest document production
Craig, Laura K.	5/15/2022	0.20	Review deposition preparation binder materials
Bonacorsi, Lauri A.	5/15/2022	0.20	Correspondence with L. Mulherin about supplemental production from New Rochelle
Hay, Daniel J.	5/16/2022	0.30	Correspond with expert regarding site visit and financial data
Craig, Laura K.	5/16/2022	0.10	Correspondence regarding deposition preparation with internal team
Todd, Gordon D.	5/16/2022	0.50	Complete review of A. Waynor deposition
Hay, Daniel J.	5/17/2022	0.30	Meet with L. Mulherin re 30(b)(6) preparation
Craig, Laura K.	5/17/2022	0.30	Meeting with D. Hay regarding deposition preparation
Craig, Laura K.	5/17/2022	2.30	Attention to discovery matters, including preparation of lease tracker compilation, research regarding expert requests, and drafting/compilation of New Rochelle 30(b)(6) deposition preparation materials
Bonacorsi, Lauri A.	5/17/2022	1.50	Conduct review of privilege log for L. Mulherin in anticipation of response to New Rochelle request
Bonacorsi, Lauri A.	5/17/2022	0.30	Assist with collecting documentation for experts
Bonacorsi, Lauri A.	5/17/2022	0.10	Finalize C. Strome deposition preparation materials
Hay, Daniel J.	5/18/2022	1.10	Call with expert regarding data for report and follow up call with L. Bonacorsi re same
Hay, Daniel J.	5/18/2022	0.50	Draft correspondence to client and to L. Mulherin re expert report
Craig, Laura K.	5/18/2022	3.60	Prepare materials for New Rochelle 30(b)(6) deposition
Bonacorsi, Lauri A.	5/18/2022	1.10	Assist with deposition preparation, including preparing C. Strome key materials
Bonacorsi, Lauri A.	5/18/2022	1.30	Assist L. Mulherin in analysis relating to privilege log and redacted information
Bonacorsi, Lauri A.	5/18/2022	1.90	Assist D. Hay with gathering key materials for experts concerning billboard assessment
Bonacorsi, Lauri A.	5/18/2022	1.10	Call with E. Herman, A. Helf and D. Hay concerning expert analysis of billboards
Ballard, Emma A.	5/18/2022	2.40	Create tracker of privilege log excerpts
Rody, David M.	5/18/2022	0.20	Correspondence with Sidley team re: deposition planning
Hay, Daniel J.	5/19/2022	0.30	Call with B. Katz re depositions and experts
Hay, Daniel J.	5/19/2022	0.20	Meet and confer regarding depositions
Bonacorsi, Lauri A.	5/19/2022	0.10	Assist with C. Strome deposition prep including locating key materials
Bonacorsi, Lauri A.	5/19/2022	0.10	Assist with analysis of underlying documents from privilege log requested by New Rochelle
Bonacorsi, Lauri A.	5/19/2022	3.00	Conduct research for experts related to age of signs
Ballard, Emma A.	5/19/2022	1.50	Create binder of documents in preparation for C. Strome deposition
Todd, Gordon D.	5/19/2022	0.40	Attention to deposition scheduling and strategy for handling 30(b)(6) issues
Rody, David M.	5/19/2022	1.00	Correspondence and conferences with Sidley team and NR counsel re: deposition planning
Craig, Laura K.	5/20/2022	0.10	Coordination regarding deposition scheduling and planning
Bonacorsi, Lauri A.	5/20/2022	0.20	Correspondence with experts regarding information requested on features of signs in New Rochelle
Bonacorsi, Lauri A.	5/20/2022	0.20	Assist with scheduling of upcoming depositions
Rody, David M.	5/20/2022	0.30	Correspondence with Sidley team, client, and NR counsel re: depositions
Hay, Daniel J.	5/22/2022	0.60	Review collection of lease tracker excerpts for production
Craig, Laura K.	5/22/2022	0.30	Review lease tracking compilation document
Bonacorsi, Lauri A.	5/22/2022	2.60	Conduct review of privilege log underlying documents containing information requested by opposing counsel
Craig, Laura K.	5/23/2022	1.00	Attention to discovery matters, including preparation of lease tracker compilation document and review of J. King deposition transcript
Todd, Gordon D.	5/23/2022	0.30	Attention to privilege dispute over lease tracker documents

Hay, Daniel J.	5/24/2022	0.20	Call with D. Rody re Strome deposition preparation
Craig, Laura K.	5/24/2022	0.20	Revise and serve amended notice of depositions
Bonacorsi, Lauri A.	5/24/2022	0.70	Assist with deposition prep for J. Scharfberg including preparing key materials
Bonacorsi, Lauri A.	5/24/2022	2.30	Prepare analysis of certain case materials for D. Rody to assist with C. Strome deposition prep
Bonacorsi, Lauri A.	5/24/2022	0.20	Call with D. Hay and L. Mulherin regarding upcoming deposition preparation
Bonacorsi, Lauri A.	5/24/2022	0.90	Call with D. Rody and D. Hay regarding C. Strome deposition
Bonacorsi, Lauri A.	5/24/2022	1.50	Prepare aspects of deposition outline and exhibits for C. Strome deposition
Ballard, Emma A.	5/24/2022	1.10	Create binder in preparation for deposition
Todd, Gordon D.	5/24/2022	0.30	Attention to scheduling 30(b)(6) deposition and prep schedule
Rody, David M.	5/24/2022	1.70	Correspondence and conferences with Sidley team re: preparations and strategy for depositions
Rody, David M.	5/24/2022	3.30	Review documents and transcripts to prepare for Strome deposition
Hay, Daniel J.	5/25/2022	2.50	Prepare for 30(b)(6) deposition
Craig, Laura K.	5/25/2022	2.10	Attention to deposition preparation for 30(b)(6) and Strome
Bonacorsi, Lauri A.	5/25/2022	5.10	Assist D. Rody with deposition preparation for C. Strome
Bonacorsi, Lauri A.	5/25/2022	0.20	Prepare deposition prep materials for A. Salgado deposition
Bonacorsi, Lauri A.	5/25/2022	0.40	Review key J. Scharfberg deposition prep materials prior to prep session
Ballard, Emma A.	5/25/2022	2.40	Prepare exhibit binders to be sent to witness in deposition
Rody, David M.	5/25/2022	3.50	Review and revise outline for Strome deposition
Rody, David M.	5/25/2022	0.80	Review documents and transcripts to prepare for Strome deposition
Rody, David M.	5/25/2022	0.70	Conferences and correspondence with Sidley team re: strategy and preparation for Strome deposition
Hay, Daniel J.	5/26/2022	4.10	Meet with J. Scharfberg to prepare for deposition
Hay, Daniel J.	5/26/2022	6.80	Prepare for Rule 30(b)(6) deposition
			Attention to discovery matters, including assistance with C. Strome deposition setup and correspondence regarding lease tracker compilation
Craig, Laura K.	5/26/2022	1.00	
Bonacorsi, Lauri A.	5/26/2022	0.70	Prepare Scharfberg deposition preparation materials in advance of prep session
Bonacorsi, Lauri A.	5/26/2022	1.30	Prepare for J. Scharfberg deposition prep session including analysis of key materials
Bonacorsi, Lauri A.	5/26/2022	4.30	Attend deposition prep session with J. Scharfberg, D. Hay, and G. Todd
Bonacorsi, Lauri A.	5/26/2022	0.40	Prepare additional key materials for J. Scharfberg review
Ballard, Emma A.	5/26/2022	3.00	Prepare binders for upcoming deposition preparation
Todd, Gordon D.	5/26/2022	6.00	Prepare for and lead deposition prep with J. Scharfberg
Rody, David M.	5/26/2022	3.50	Prepare for and take deposition of C. Strome
Rody, David M.	5/26/2022	1.00	Attend deposition prep for J. Scharfberg
Hay, Daniel J.	5/27/2022	1.60	Prepare for Rule 30(b)(6) deposition
Craig, Laura K.	5/27/2022	1.30	Attention to discovery matters, including review of revised 30(b)(6) outline
Bonacorsi, Lauri A.	5/27/2022	1.60	Outline mock deposition for J. Scharfberg prep session
Hay, Daniel J.	5/28/2022	1.50	Prepare for Rule 30(b)(6) deposition
Bonacorsi, Lauri A.	5/28/2022	5.50	Draft deposition outline for J. Scharfberg preparation session
Hay, Daniel J.	5/29/2022	3.00	Prepare for Rule 30(b)(6) deposition
Craig, Laura K.	5/29/2022	0.50	Prepare exhibits for New Rochelle 30(b)(6) deposition
Craig, Laura K.	5/29/2022	0.20	Review mock cross outline for 30(b)(6) witness
Bonacorsi, Lauri A.	5/29/2022	2.90	Draft deposition outline for J. Scharfberg prep session
Craig, Laura K.	5/30/2022	1.20	Review mock cross outline for 30(b)(6) witness
Bonacorsi, Lauri A.	5/30/2022	1.70	Revise J. Scharfberg deposition prep outline
			Attention to deposition preparation, including finalizing exhibit set for 30(b)(6) and preparing searches of preparation documents for 30(b)(6) mock cross
Craig, Laura K.	5/31/2022	2.50	
Bonacorsi, Lauri A.	5/31/2022	2.80	Finalize J. Scharfberg deposition preparation outline
Ballard, Emma A.	5/31/2022	0.50	Prepare binder for L. Bonacorsi for deposition prep
Todd, Gordon D.	5/31/2022	3.50	Prepare for J. Scharfberg deposition prep session
Craig, Laura K.	6/1/2022	0.50	Attention to deposition preparation, including review of documents and compilation of exhibits
Bonacorsi, Lauri A.	6/1/2022	1.00	Finalize prep materials including mock deposition outline for J. Scharfberg
Bonacorsi, Lauri A.	6/1/2022	0.20	Assist with preparation of exhibits for A. Salgado deposition
Bonacorsi, Lauri A.	6/1/2022	6.00	Work with G. Todd and J. Scharfberg on 30(b)(6) preparation
Ballard, Emma A.	6/1/2022	0.70	Assist L. Mulherin with preparing exhibits for deposition
Todd, Gordon D.	6/1/2022	7.50	Prepare J. Scharfberg for 30(b)(6) deposition
Rody, David M.	6/1/2022	0.30	Correspondence with Sidley team re: document strategy issues
Hay, Daniel J.	6/2/2022	8.50	Prepare for and take Rule 30(b)(6) deposition
Bonacorsi, Lauri A.	6/2/2022	1.70	Assist with deposition prep for A. Salgado and J. Scharfberg depositions
Todd, Gordon D.	6/2/2022	7.00	Prepare for and defend J. Scharfberg deposition
Hay, Daniel J.	6/3/2022	0.70	Draft summary of Salgado deposition for G. Todd, D. Rody
Craig, Laura K.	6/3/2022	0.20	Finalize exhibit set from A. Salgado deposition
Bonacorsi, Lauri A.	6/3/2022	1.40	Prepare materials requested by expert witnesses for their report
Ballard, Emma A.	6/3/2022	1.80	Assist L. Mulherin with preparing exhibits used in deposition
Hay, Daniel J.	6/4/2022	0.50	Draft letter to court seeking leave to supplement motion for partial summary judgment
Craig, Laura K.	6/4/2022	0.30	Review finalized exhibit set for A. Salgado deposition
Hay, Daniel J.	6/6/2022	0.60	Call with expert re valuation report
			Attention to discovery matters, including review of privilege research question and preparation of summer associate assignment
Craig, Laura K.	6/6/2022	0.40	
Bonacorsi, Lauri A.	6/6/2022	0.90	Assist with assigning summer associate research on claims in anticipation of summary judgment
Bonacorsi, Lauri A.	6/6/2022	0.10	Gather materials requested by expert witness to assist with report drafting
Bonacorsi, Lauri A.	6/6/2022	0.60	Call with A. Helf and D. Hay on expert report
Bonacorsi, Lauri A.	6/6/2022	0.30	Prepare list of action items for D. Hay post-call with A. Helf
Rody, David M.	6/6/2022	0.30	Correspondence with Sidley team re: 30(b)(6) depositions and case strategy
Hay, Daniel J.	6/7/2022	0.80	Review transcript of 30(b)(6) deposition
Bonacorsi, Lauri A.	6/7/2022	2.70	Conduct research on prospective privilege claims arising from depositions

Bonacorsi, Lauri A.	6/7/2022	0.30	Correspondence with A. Helf, including locating and providing relevant litigation files
Craig, Laura K.	6/8/2022	0.30	Review deposition transcript summaries
Bonacorsi, Lauri A.	6/8/2022	8.10	Draft analysis of key deposition quotes from New Rochelle / TRA deposition transcripts
Bonacorsi, Lauri A.	6/8/2022	2.00	Conduct research on prospective privilege claim arising from deposition
Hay, Daniel J.	6/9/2022	1.20	Revise motion to supplement motion for summary judgment
Craig, Laura K.	6/9/2022	0.10	Review discovery letter regarding motion for summary judgment
Bonacorsi, Lauri A.	6/9/2022	4.00	Conduct research on prospective privilege claim arising from deposition
Bonacorsi, Lauri A.	6/9/2022	3.20	Assist with drafting of supplemental letter to court, focusing on key deposition quotes for support
Bonacorsi, Lauri A.	6/9/2022	1.30	Conduct analysis of key deposition quotes from New Rochelle and TRA depositions
Todd, Gordon D.	6/9/2022	0.70	Review and revise letter motion to supplement brief
Rody, David M.	6/9/2022	0.30	Correspondence with Sidley team re: supplemental MSJ letter
Hay, Daniel J.	6/10/2022	0.40	Revise motion to supplement motion for summary judgment
Craig, Laura K.	6/10/2022	0.10	Prepare response to New Rochelle's discovery deficiency letter
Bonacorsi, Lauri A.	6/10/2022	0.40	Conduct review of deposition transcripts, including analyzing key quotes
Bonacorsi, Lauri A.	6/10/2022	1.20	Prepare exhibits for supplemental letter motion
Bonacorsi, Lauri A.	6/10/2022	1.40	Assist with filing of supplemental letter motion in support of partial summary judgment
Todd, Gordon D.	6/10/2022	0.30	Work on scope of expert witness testimony issue regarding premium pricing
Hay, Daniel J.	6/12/2022	1.20	Review and comment on draft appraisal report
Hay, Daniel J.	6/13/2022	0.80	Review and comment on draft appraisal report
Hay, Daniel J.	6/13/2022	0.20	Revise email to opposing counsel re 30(b)(6) deposition documents
Hay, Daniel J.	6/13/2022	0.40	Call with L. Mulherin re upcoming case deadlines and summary judgment
			Attention to discovery matters, including drafting response to New Rochelle regarding post-deposition document requests, preparing production of documents reviewed by 30(b)(6), review of expert report and D. Hay comments regarding same, and call with D. Hay regarding case strategy
Craig, Laura K.	6/13/2022	2.00	
Bonacorsi, Lauri A.	6/13/2022	0.50	Review New Rochelle 30(b)(6) prep materials for L. Mulherin
Bonacorsi, Lauri A.	6/13/2022	3.70	Conduct search of lease files for A. Helf and E. Herman
Bonacorsi, Lauri A.	6/13/2022	0.80	Prepare outline of key deposition quotes, focusing on A. Wayner and A. Salgado
Hay, Daniel J.	6/14/2022	0.50	Revise email to opposing counsel re 30(b)(6) deposition documents
			Attention to discovery work streams, including preparing letter response to New Rochelle's post-deposition request, review of New Rochelle's cross letter motion regarding summary judgment
Craig, Laura K.	6/14/2022	0.60	
Bonacorsi, Lauri A.	6/14/2022	1.30	Assist in compiling documents made accessible to J. Scharfberg in deposition preparation in anticipation of production to opposing counsel
Bonacorsi, Lauri A.	6/14/2022	0.10	Assist A. Helf in accessing lease-related documents for expert report
Bonacorsi, Lauri A.	6/14/2022	2.10	Prepare outline of key deposition quotes, focusing on A. Wayner and A. Salgado
Todd, Gordon D.	6/14/2022	3.20	Review draft expert report from E. Herman
Rody, David M.	6/14/2022	0.20	Correspondence with Sidley team re: next steps in litigation
Rody, David M.	6/14/2022	0.30	Review correspondence to and from NR counsel
Hay, Daniel J.	6/15/2022	0.30	Review and comment on draft expert report
Craig, Laura K.	6/15/2022	0.10	Correspondence with D. Hay regarding cross motion for discovery
			Prepare outline of key deposition quotes to aid in drafting summary judgment motion, focusing on A. Salgado
Bonacorsi, Lauri A.	6/15/2022	5.70	
Todd, Gordon D.	6/15/2022	0.60	Markup and circulate draft E. Herman expert report
Bonacorsi, Lauri A.	6/16/2022	0.40	Analyze key quotes from L. Aragon deposition
Hay, Daniel J.	6/17/2022	0.40	Compile materials for expert's reliance list
Hay, Daniel J.	6/17/2022	0.90	Call with A. Helf, L. Bonacorsi re draft expert report
Craig, Laura K.	6/17/2022	0.40	Review of J. King deposition transcript
Craig, Laura K.	6/17/2022	0.40	Call with L. Bonacorsi regarding post-fact discovery assignments
Bonacorsi, Lauri A.	6/17/2022	1.90	Review L. Aragon deposition, including analysis of key quotes
Bonacorsi, Lauri A.	6/17/2022	0.50	Call with L. Mulherin regarding prospective productions, privilege research, and summary judgment
Bonacorsi, Lauri A.	6/17/2022	1.00	Call with D. Hay and A. Helf concerning draft expert report
Bonacorsi, Lauri A.	6/17/2022	1.30	Draft list of materials relied upon by experts in preparing the report
Bonacorsi, Lauri A.	6/18/2022	2.20	Draft analysis of key deposition quotes for D. Hay and L. Mulherin
Bonacorsi, Lauri A.	6/19/2022	0.10	Make final edits to deposition analysis document
Craig, Laura K.	6/20/2022	0.90	Attention to discovery matters, including preparation of instructions for last production
Todd, Gordon D.	6/20/2022	0.20	Correspondence with S. Llach regarding non-retained damages expert testimony
Hay, Daniel J.	6/21/2022	0.20	Review and comment on draft expert report
			Attention to discovery matters, including drafting expert disclosure, revising interrogatories regarding expert matters, review of expert report, and preparation of documents for production
Craig, Laura K.	6/21/2022	2.00	
Bonacorsi, Lauri A.	6/21/2022	1.90	Prepare production to New Rochelle containing newly unredacted documents and certain files used by experts
Todd, Gordon D.	6/21/2022	1.40	Review and comment on revised draft of E. Harman expert valuation report
Todd, Gordon D.	6/21/2022	0.20	Correspondence with S. Llach regarding valuation methodology and use of non-retained expert
Hay, Daniel J.	6/22/2022	0.50	Calls with A. Helf re expert report
Hay, Daniel J.	6/22/2022	0.70	Review and revise expert disclosure and second supplemental interrogatory response
Hay, Daniel J.	6/22/2022	1.90	Review and comment on draft expert report valuation analysis
			Attention to discovery matters, including call with D. Hay regarding discovery responses, finalize and revise draft interrogatories and expert disclosures, and correspondence with opposing counsel regarding post-30(b)(6) document requests
Craig, Laura K.	6/22/2022	0.70	Prepare production to New Rochelle containing newly unredacted documents and certain files used by experts
Bonacorsi, Lauri A.	6/22/2022	1.10	
Rody, David M.	6/22/2022	0.20	Correspondence with Sidley team and client re: expert report
Hay, Daniel J.	6/23/2022	0.30	Call with A. Helf re expert report
Craig, Laura K.	6/23/2022	0.10	Review of proposed production specifications
			Prepare production to New Rochelle containing newly unredacted documents and certain files used by experts
Bonacorsi, Lauri A.	6/23/2022	0.20	

Todd, Gordon D.	6/23/2022	0.30	Attention to strategy for summary judgment briefing and beyond and discuss same with D. Hay
Todd, Gordon D.	6/23/2022	0.80	Review expert disclosure, updated discovery responses integrating expert materials, and Herman report
Rody, David M.	6/23/2022	0.20	Correspondence with Sidley team re: SJ strategy
Hay, Daniel J.	6/24/2022	0.80	Review final expert report
Hay, Daniel J.	6/24/2022	0.30	Call with A. Helf re expert report
Craig, Laura K.	6/24/2022	1.30	Attention to discovery matters, including meeting with summer associate and D. Hay regarding legal research
Bonacorsi, Lauri A.	6/24/2022	1.30	Prepare production to New Rochelle containing newly unredacted documents and certain files used by experts
Bonacorsi, Lauri A.	6/24/2022	0.50	Draft cover letter for production to New Rochelle
Todd, Gordon D.	6/24/2022	0.50	Final review and production of E. Harman expert report
Bonacorsi, Lauri A.	6/26/2022	0.80	Research rules regarding scope of rebuttal reports
Craig, Laura K.	6/27/2022	0.30	Preparation of summer associate legal research assignment materials
Bonacorsi, Lauri A.	6/27/2022	0.80	Research rules regarding scope of rebuttal reports
Craig, Laura K.	6/28/2022	0.30	Review proposed discovery schedule
Todd, Gordon D.	6/28/2022	0.20	Attention to schedule adjustments including delay in status conference and expert report dates
Rody, David M.	6/28/2022	0.40	Correspondence with Sidley team and NR counsel re: discovery issues
Hay, Daniel J.	6/29/2022	2.00	Review Scharfberg deposition transcript
Bonacorsi, Lauri A.	6/29/2022	5.10	Review J. Scharfberg 30(b)(6) deposition transcript for errors
Rody, David M.	6/29/2022	0.20	Correspondence with all counsel and Sidley team re: discovery schedule
Craig, Laura K.	6/30/2022	0.10	Correspondence regarding 30(b)(6) errata sheet
Bonacorsi, Lauri A.	6/30/2022	1.70	Review J. Scharfberg 30(b)(6) deposition transcript for errors
Craig, Laura K.	7/1/2022	0.60	Attention to discovery matters, including review of deposition testimony and research regarding scope of rebuttal report
Bonacorsi, Lauri A.	7/1/2022	1.10	Review J. Scharfberg 30(b)(6) deposition transcript for errors
Craig, Laura K.	7/5/2022	0.20	Research regarding verification of errata sheets
Bonacorsi, Lauri A.	7/6/2022	0.10	Review J. Scharfberg 30(b)(6) deposition transcript for errors
Craig, Laura K.	7/7/2022	0.20	Attention to reviewing discovery response letter from opposing counsel
Craig, Laura K.	7/8/2022	0.30	Call with L. Bonacorsi regarding ongoing work streams
Craig, Laura K.	7/8/2022	0.20	Attention to discovery matters, including review of L. Bonacorsi summary of correspondence review and correspondence regarding discovery schedule
Bonacorsi, Lauri A.	7/8/2022	1.00	Review O. Campbell's case analysis on Due Process and First Amendment claims
Bonacorsi, Lauri A.	7/8/2022	1.30	Prepare final errata form for J. Scharfberg, including research on procedural rules for submission
Bonacorsi, Lauri A.	7/8/2022	1.70	Analyze documents referenced by New Rochelle in response letter
Bonacorsi, Lauri A.	7/9/2022	2.80	Analysis of O. Campbell's case law research on Due Process and First Amendment questions, including confirmatory research
Bonacorsi, Lauri A.	7/9/2022	3.70	Research concerning applicable First Amendment standard in anticipation of summary judgment
Craig, Laura K.	7/10/2022	0.10	Review of summer associate research assignment
Bonacorsi, Lauri A.	7/10/2022	2.40	Prepare analysis of law relating to Counts IV and V of complaint, focusing on recent case law
Bonacorsi, Lauri A.	7/11/2022	0.10	Finalize errata for Veritext from J. Scharfberg deposition
Craig, Laura K.	7/12/2022	0.20	Call with L. Bonacorsi and O. Coleman regarding summer research assignment
Bonacorsi, Lauri A.	7/12/2022	2.40	Research on new law concerning First Amendment standard
Hay, Daniel J.	7/13/2022	0.40	Call with G. Todd, D. Rody re status conference preparation
Bonacorsi, Lauri A.	7/13/2022	0.70	Research concerning First Amendment claim in anticipation of summary judgment
Todd, Gordon D.	7/13/2022	0.40	Confer with D. Hay and D. Rody regarding strategy for monthly conference with magistrate judge
Rody, David M.	7/13/2022	0.40	Correspondence and conferences with Sidley team re: prep for July 14 court conference
Hay, Daniel J.	7/14/2022	0.70	Prepare for and attend status conference
Craig, Laura K.	7/14/2022	0.10	Call with L. Bonacorsi regarding discovery matters
Rody, David M.	7/14/2022	0.50	Correspondence and conferences with Sidley team re: court conference and follow up
Todd, Gordon D.	7/20/2022	0.30	Confer with S. Llach and D. Hay regarding renewed mediation possibility
Bonacorsi, Lauri A.	7/25/2022	1.80	Review summer associate findings on due process claim
Craig, Laura K.	7/26/2022	0.10	Review summer associate legal research regarding due process
Bonacorsi, Lauri A.	7/30/2022	0.20	Analysis of procedural due process standard in anticipation of summary judgment
Hay, Daniel J.	8/3/2022	1.40	Draft mediation statement
Craig, Laura K.	8/8/2022	0.10	Review NY Thruway permits
Bonacorsi, Lauri A.	8/8/2022	0.10	Correspondence with L. Mulherin regarding redacted documents produced by NR
Craig, Laura K.	8/9/2022	1.40	Prepare Thruway permits for production, including review of permits and analysis of permit inventory
Bonacorsi, Lauri A.	8/9/2022	1.40	Review of documents ordered produced by New Rochelle
Craig, Laura K.	8/10/2022	0.10	Review letter motion regarding mediation request
Craig, Laura K.	8/11/2022	0.30	Finalize production of Thruway permits
Craig, Laura K.	8/15/2022	2.10	Review and analyze City of New Rochelle's expert report
Bonacorsi, Lauri A.	8/15/2022	1.70	Assess expert rebuttal report
Ballard, Emma A.	8/15/2022	0.50	Create comparison of expert witness' analysis of market value of billboards
Hay, Daniel J.	8/16/2022	1.10	Review New Rochelle's expert report
Bonacorsi, Lauri A.	8/16/2022	2.10	Assess expert rebuttal report
Hay, Daniel J.	8/19/2022	0.90	Attend status conference to discuss mediation
Todd, Gordon D.	8/19/2022	1.50	Prepare for and participate in conference with MJ Krause regarding possible mediation
Todd, Gordon D.	8/19/2022	0.20	Correspondence with S. Llach regarding mediation planning
Hay, Daniel J.	8/21/2022	0.10	Draft letter to court re mediation date
Todd, Gordon D.	8/22/2022	0.30	Correspondence with MJ Krause regarding mediation date
Hay, Daniel J.	8/23/2022	0.30	Outline mediation statement
Craig, Laura K.	8/25/2022	0.30	Research regarding deadlines for filing objections to a report and recommendation
Hay, Daniel J.	8/31/2022	1.10	Draft mediation statement
Hay, Daniel J.	8/31/2022	1.10	Call with client re mediation strategy

Todd, Gordon D.	8/31/2022	2.00	Hay
Hay, Daniel J.	9/1/2022	2.00	Draft mediation statement
Hay, Daniel J.	9/1/2022	0.60	Draft request for electronics during mediation
Bonacorsi, Lauri A.	9/2/2022	0.10	Legal analysis on prospective third-party claims against New Rochelle in anticipation of mediation
Bonacorsi, Lauri A.	9/5/2022	7.40	Legal analysis on prospective third-party claims against New Rochelle in anticipation of mediation
Craig, Laura K.	9/6/2022	0.60	Attention to legal research regarding mediation
Bonacorsi, Lauri A.	9/6/2022	0.40	Legal analysis on prospective third-party claims against New Rochelle in anticipation of mediation
Hay, Daniel J.	9/9/2022	0.90	Review summary judgment report and recommendation
Hay, Daniel J.	9/9/2022	0.60	Call with L. Mulherin, L. Bonacorsi re summary judgment ruling
Hay, Daniel J.	9/9/2022	0.60	Calls with G. Todd, B. Katz re summary judgment ruling
Hay, Daniel J.	9/9/2022	1.20	Research laches defense in connection with summary judgment ruling
Bonacorsi, Lauri A.	9/9/2022	0.80	Calls with D. Hay and L. Mulherin regarding legal research post-SJ decision
Bonacorsi, Lauri A.	9/9/2022	2.80	Conduct research on issues related to laches
Todd, Gordon D.	9/9/2022	0.50	Prepare for upcoming mediation
Todd, Gordon D.	9/9/2022	0.90	Review and analyze report and recommendation regarding summary judgment motion
Craig, Laura K.	9/10/2022	0.70	Research regarding objections to report and recommendation
Bonacorsi, Lauri A.	9/10/2022	3.30	Conduct research on issues related to laches
Bonacorsi, Lauri A.	9/10/2022	0.70	Review of partial summary judgment decision to aid in research
Bonacorsi, Lauri A.	9/11/2022	3.90	Conduct research on issues related to laches
Todd, Gordon D.	9/11/2022	1.30	Work on objection to magistrate R&R on partial summary judgment motion
Hay, Daniel J.	9/12/2022	2.40	Revise mediation statement and settlement proposal
Hay, Daniel J.	9/12/2022	0.60	Call with client to discuss mediation
Hay, Daniel J.	9/12/2022	0.30	Revise and file request for electronics at mediation
Craig, Laura K.	9/12/2022	0.10	Correspondence regarding mediation materials
Bonacorsi, Lauri A.	9/12/2022	1.00	Research argument against laches defense
Bonacorsi, Lauri A.	9/12/2022	0.80	Legal analysis on prospective third-party claims against New Rochelle in anticipation of mediation
Todd, Gordon D.	9/12/2022	0.60	Conference call with CCO team regarding mediation
Hay, Daniel J.	9/13/2022	0.50	Revise mediation statement
Craig, Laura K.	9/13/2022	0.10	Correspondence regarding objections to report and recommendation
Bonacorsi, Lauri A.	9/13/2022	2.70	Prepare materials for reference during mediation
Bonacorsi, Lauri A.	9/13/2022	0.30	Pre-mediation research concerning hypothetical litigation related to OFM
Todd, Gordon D.	9/13/2022	2.80	Further review and revision of draft confidential mediation statement
Todd, Gordon D.	9/13/2022	0.40	Call with D. Chafizedah regarding settlement discussions
Hay, Daniel J.	9/14/2022	0.50	Call with G. Todd, S. Llach, J. Scharfberg re mediation
Bonacorsi, Lauri A.	9/14/2022	5.50	Pre-mediation research concerning hypothetical litigation related to OFM
Bonacorsi, Lauri A.	9/14/2022	0.40	Prepare materials for reference during mediation
Ballard, Emma A.	9/14/2022	0.50	Assist L. Bonacorsi with preparing e-binder for mediation
Todd, Gordon D.	9/14/2022	1.50	Multiple calls with S. Llach, J. Sharfberg, D. Hay regarding mediation
Todd, Gordon D.	9/14/2022	0.30	Correspondence with D. Chafizedah regarding mediation issues
Hay, Daniel J.	9/15/2022	0.90	Call with client and opposing counsel re settlement
Hay, Daniel J.	9/15/2022	0.30	Call with G. Todd, S. Llach, J. Scharfberg re mediation preparation
Craig, Laura K.	9/15/2022	0.80	Attention to preparing objections to report and recommendation, including legal research regarding same
Bonacorsi, Lauri A.	9/15/2022	0.20	Prepare materials for reference during mediation
Bonacorsi, Lauri A.	9/15/2022	2.80	Pre-mediation research concerning hypothetical litigation related to OFM
Bonacorsi, Lauri A.	9/15/2022	1.00	Review of partial summary judgment decision to aid in research
Ballard, Emma A.	9/15/2022	0.10	Assist L. Bonacorsi with preparing e-binder for mediation
Todd, Gordon D.	9/15/2022	1.00	Conference with CCO team and D. Chafizedah to discuss settlement issues
Hay, Daniel J.	9/16/2022	0.40	Compile talking points regarding mediation
Craig, Laura K.	9/16/2022	3.00	Draft objections to report and recommendation, including legal research regarding same
Todd, Gordon D.	9/16/2022	9.00	Prepare for and participate in mediation
Hay, Daniel J.	9/17/2022	2.60	Revise objections to magistrate's report and recommendation
Craig, Laura K.	9/17/2022	2.80	Draft objections to report and recommendation, including legal research regarding same
Hay, Daniel J.	9/18/2022	1.30	Revise objections to magistrate's report and recommendation
Hay, Daniel J.	9/18/2022	1.00	Revise objections to magistrate's report and recommendation
Hay, Daniel J.	9/19/2022	0.40	Calls with expert re analysis of New Rochelle's valuation
Hay, Daniel J.	9/19/2022	4.00	Revise objections to magistrate's report and recommendation
Hay, Daniel J.	9/19/2022	0.30	Draft letter to magistrate re expert discovery
Craig, Laura K.	9/19/2022	2.50	Attention to preparing objections to report and recommendation
Hay, Daniel J.	9/20/2022	2.60	Revise objections to R&R
Hay, Daniel J.	9/20/2022	0.50	Call with expert re cap rate analysis
Todd, Gordon D.	9/20/2022	3.20	Review and revise draft objections to MJ R&R
Hay, Daniel J.	9/21/2022	1.50	Revise objections to R&R
Bonacorsi, Lauri A.	9/21/2022	0.70	Conduct research on issues related to laches
Todd, Gordon D.	9/21/2022	1.60	Continue to work on draft objections to Magistrate's R&R
Hay, Daniel J.	9/22/2022	1.50	Revise objections to R&R
DeVillier, Danielle	9/22/2022	5.00	Complete cite check with J. Meehan for D. Hay, L. Mulherin.
Craig, Laura K.	9/22/2022	0.50	Attention to preparing objections to report and recommendation, including call with opposing counsel
Bonacorsi, Lauri A.	9/22/2022	1.50	Conduct research on issues related to laches
Meehan, John	9/22/2022	6.00	Cite check objections to report and recommendation on motion for partial summary judgment, case no. 7:20-cv-9296 (S.D.N.Y.)
Hay, Daniel J.	9/23/2022	0.10	Revise and file objections to R&R
DeVillier, Danielle	9/23/2022	0.30	Verify completion of cite check with J. Meehan for D. Hay, L. Mulherin.
Craig, Laura K.	9/23/2022	0.70	Attention to finalizing filing of objections to report and recommendation

Bonacorsi, Lauri A.	9/23/2022	1.00	Final edits to objections to R&R
Todd, Gordon D.	9/23/2022	0.20	Correspondence with Sidley team regarding City objections to R&R and filing under seal
Hay, Daniel J.	9/24/2022	0.60	Review New Rochelle's objections to R&R
Bonacorsi, Lauri A.	9/24/2022	0.90	Analysis of City's objections to R&R
Craig, Laura K.	9/25/2022	1.40	Draft outline of response to New Rochelle's objections to Report and Recommendation
Hay, Daniel J.	9/26/2022	0.30	Call with L. Mulherin, L. Bonacorsi re opposition to New Rochelle's objections
Craig, Laura K.	9/26/2022	2.10	Attention to preparing response to Defendants' objections to Report and Recommendation, including call with D. Hay and L. Bonacorsi regarding same
Bonacorsi, Lauri A.	9/26/2022	1.60	Analysis for responses to NR's objections to R&R
			Close review of City's objections to Magistrate's Ruling and Recommendation and sketch out
Todd, Gordon D.	9/26/2022	3.50	response brief
Bonacorsi, Lauri A.	9/27/2022	3.50	Draft sections of response to NR's R&R
Bonacorsi, Lauri A.	9/28/2022	4.00	Draft sections of response to NR's R&R
Hay, Daniel J.	9/29/2022	2.80	Draft pre-motion letter for summary judgment
Craig, Laura K.	9/29/2022	0.30	Research regarding location of billboards
Todd, Gordon D.	9/29/2022	0.40	Review and revise draft pre-motion letter
Hay, Daniel J.	9/30/2022	0.20	Revise premotion letter for summary judgment
Craig, Laura K.	9/30/2022	1.00	Attention to preparing response to objections filed by Defendants
Bonacorsi, Lauri A.	9/30/2022	3.50	Analysis of documents related to RFP
Todd, Gordon D.	9/30/2022	0.30	Further review and revision of pre-motion letter to Judge Roman
Hay, Daniel J.	10/1/2022	1.50	Revise opposition to New Rochelle's R&R objections
Craig, Laura K.	10/1/2022	3.00	Draft response to defendants' objections to Report & Recommendation
Hay, Daniel J.	10/2/2022	4.30	Revise opposition to Defendants' objections to R&R
Bonacorsi, Lauri A.	10/2/2022	1.10	Conduct research for response to NR's objection to R&R
Hay, Daniel J.	10/3/2022	1.40	Revise opposition to Defendants' objections to R&R
Hay, Daniel J.	10/3/2022	1.10	Revise opposition to New Rochelle's objections to R&R
Hay, Daniel J.	10/3/2022	0.20	Finalize and file pre-motion letter
Hay, Daniel J.	10/3/2022	0.30	Review New Rochelle's pre-motion letter
Craig, Laura K.	10/3/2022	2.90	Revise response to Defendants' objections to Report & Recommendation
Craig, Laura K.	10/3/2022	0.80	Research regarding possible motion to strike City's valuation expert report
Bonacorsi, Lauri A.	10/3/2022	3.10	Conduct research for response to NR's objection to R&R
Bonacorsi, Lauri A.	10/3/2022	1.80	Draft section of response to NR's objection to R&R
Todd, Gordon D.	10/3/2022	0.30	Review and comment on New Rochelle pre-motion letter
Hay, Daniel J.	10/4/2022	2.30	Draft response to New Rochelle's pre-motion letter
Hay, Daniel J.	10/4/2022	1.10	Call with court re settlement and follow up meetings with client and G. Todd re same
Bonacorsi, Lauri A.	10/4/2022	1.00	Research for section of response to NR's objection to R&R
			Prepare for and participate in conference with MJ Krause regarding settlement discussions and follow
Todd, Gordon D.	10/4/2022	1.40	up with S. Llach and J. Scharfberg re same
Hay, Daniel J.	10/5/2022	0.50	Revise response to New Rochelle's pre-motion letter
			Attention to preparing filings regarding response to New Rochelle's objections to Report and
Craig, Laura K.	10/5/2022	2.00	Recommendation and pre-motion letter for summary judgment, including legal research regarding
Bonacorsi, Lauri A.	10/5/2022	5.40	same
Todd, Gordon D.	10/5/2022	0.80	Conduct research for response to NR's objection to R&R
Hay, Daniel J.	10/6/2022	1.50	motion
Hay, Daniel J.	10/6/2022	1.50	Revise opposition to New Rochelle's objections
Hay, Daniel J.	10/6/2022	0.40	Revise response to pre-motion letter
DeVillier, Danielle	10/6/2022	6.00	Cite-check submission with J. Meehan for L. Mulherin regarding plaintiff's response to defendant's
Craig, Laura K.	10/6/2022	0.90	objections.
Todd, Gordon D.	10/6/2022	4.40	Attention to preparing responses to New Rochelle's objections to Report and Recommendation
			Review and revise opposition to City's exceptions from J. Krause ruling
Meehan, John	10/6/2022	1.00	Draft table of authorities for response to defendants' objections to report and recommendations, case
			no. 7:20-cv-9296 (S.D.N.Y.)
Meehan, John	10/6/2022	4.00	Cite check response to defendants' objections to report and recommendations, case no. 7:20-cv-
			9296 (S.D.N.Y.)
Hay, Daniel J.	10/7/2022	0.60	Review New Rochelle's response to R&R objections and pre-motion letter
Hay, Daniel J.	10/7/2022	2.20	Review and file response to pre-motion letter and R&R objections
DeVillier, Danielle	10/7/2022	3.00	Cite-check submission with J. Meehan for L. Mulherin regarding plaintiff's response to defendant's
Craig, Laura K.	10/7/2022	2.90	objections.
Bonacorsi, Lauri A.	10/7/2022	0.20	Attention to finalizing response in opposition to New Rochelle's objections
Bonacorsi, Lauri A.	10/7/2022	1.00	Review of City's response to CCO's objection to R&R
			Final review of response to NR's objection to R&R
Todd, Gordon D.	10/7/2022	1.50	Review City's response to CCO pre-motion letter and City's opposition to CCO's objections to R&R
			and confer with D. Hay regarding both
Meehan, John	10/7/2022	3.80	Cite check revised response to defendants' objections to report and recommendations, case no. 7:20-
			cv-9296 (S.D.N.Y.)
Meehan, John	10/7/2022	1.50	Assist in final preparation of revised response to defendants' objections to report and
			recommendations, case no. 7:20-cv-9296 (S.D.N.Y.)
Craig, Laura K.	10/9/2022	0.40	Attention to preparing reply to response to Clear Channel's objections to report and recommendation,
Craig, Laura K.	10/10/2022	0.20	including review response to objections and outline of reply
Bonacorsi, Lauri A.	10/10/2022	3.10	Call with L. Bonacorsi regarding reply to objections
Bonacorsi, Lauri A.	10/10/2022	6.20	Draft R&R reply
Bonacorsi, Lauri A.	10/10/2022	0.20	Analysis of arguments for R&R reply, including laches research
Hay, Daniel J.	10/11/2022	0.40	Call with L. Mulherin regarding R&R reply
Craig, Laura K.	10/11/2022	0.70	Draft FOIL request
Bonacorsi, Lauri A.	10/11/2022	3.80	Draft reply in support of objections to Report & Recommendation

Hay, Daniel J.	10/12/2022	3.40	Revise reply in support of R&R objections
Craig, Laura K.	10/12/2022	3.50	Draft reply in support of objections to Report & Recommendation
DeVillier, Danielle	10/13/2022	6.50	Cite check submission for L. Mulherin regarding plaintiff's reply in support of its objection to the report and recommendation on the motion for partial summary judgment.
Craig, Laura K.	10/13/2022	2.00	Attention to preparing reply in support of objections to Report and Recommendation
Bonacorsi, Lauri A.	10/13/2022	0.10	Finalize R&R response
Todd, Gordon D.	10/13/2022	1.00	Review and revise draft reply i/s/o objections to Magistrate R&R
Hay, Daniel J.	10/14/2022	1.20	Revise reply in support of objections to R&R
DeVillier, Danielle	10/14/2022	4.00	Cite check submission for L. Mulherin regarding plaintiff's reply in support of its objection to the report and recommendation on the motion for partial summary judgment.
DeVillier, Danielle	10/14/2022	1.00	Finalize for filing submission for L. Mulherin regarding plaintiff's reply in support of its objection to the report and recommendation on the motion for partial summary judgment.
Craig, Laura K.	10/14/2022	1.00	Finalize reply in support of objections to Report and Recommendation
Bonacorsi, Lauri A.	10/14/2022	0.30	Finalize R&R reply
Todd, Gordon D.	10/14/2022	1.20	Further review and revision of draft reply i/s/o objections to Magistrate R&R
Craig, Laura K.	10/17/2022	0.20	Preparation for meeting regarding affirmative litigation options
Bonacorsi, Lauri A.	10/17/2022	1.50	Prepare compilation of research on challenges to OFM illegal signs
Bonacorsi, Lauri A.	10/17/2022	2.40	Research on prospective challenges to OFM signs
Craig, Laura K.	10/18/2022	0.60	Review affirmative litigation options research
Craig, Laura K.	10/18/2022	0.70	Attend meeting with G. Todd, D. Hay, and L. Bonacorsi regarding litigation options, including post-meeting with D. Hay
Bonacorsi, Lauri A.	10/18/2022	1.00	Research on prospective challenges to OFM signs
Bonacorsi, Lauri A.	10/18/2022	0.50	Meeting with G. Todd, D. Hay, L. Mulherin regarding prospective sign challenges
Todd, Gordon D.	10/18/2022	2.50	Review all prior research regarding I-95 signs
Craig, Laura K.	10/19/2022	2.90	Prepare affirmative litigation options memorandum, including legal research regarding same, including meeting with D. Hay regarding same
Bonacorsi, Lauri A.	10/19/2022	0.70	Research Thruway Authority rules relating to sign permitting and removal
Bonacorsi, Lauri A.	10/19/2022	2.10	Assist with preparing research memo of prospective permit challenges
Craig, Laura K.	10/20/2022	3.90	Prepare affirmative litigation options memorandum, including legal research regarding same
Bonacorsi, Lauri A.	10/20/2022	1.20	Assist with preparing research memo of prospective permit challenges
Hay, Daniel J.	10/21/2022	0.50	Review ruling on summary judgment
Hay, Daniel J.	10/21/2022	0.30	Call with G. Todd, L. Mulherin, L. Bonacorsi re summary judgment ruling
Hay, Daniel J.	10/21/2022	2.40	Outline summary judgment brief
Hay, Daniel J.	10/21/2022	1.00	Research implications of summary judgment ruling
Craig, Laura K.	10/21/2022	2.30	same
Bonacorsi, Lauri A.	10/21/2022	1.00	Research concerning potential challenges to OFM signs
Bonacorsi, Lauri A.	10/21/2022	0.30	Review opinion on R&R
Bonacorsi, Lauri A.	10/21/2022	0.30	Conference on post-SJ steps with G. Todd, D. Hay and L. Mulherin
Todd, Gordon D.	10/21/2022	1.00	Review Opinion and Order granting CCO partial summary judgment and discuss same with S. Llach and D. Hay
Todd, Gordon D.	10/21/2022	0.50	Confer with Sidley team regarding next steps
Todd, Gordon D.	10/21/2022	2.20	Review and revise research memo regarding signage laws
Hay, Daniel J.	10/22/2022	1.60	Research motion for summary judgment
Hay, Daniel J.	10/23/2022	1.00	Revise outline of summary judgment brief
Craig, Laura K.	10/23/2022	1.00	Research regarding motion for summary judgment preparation
Todd, Gordon D.	10/23/2022	1.00	Attention to outline of proposed motion for summary judgment revised in view of grant of partial summary judgment
Hay, Daniel J.	10/24/2022	0.70	Revise summary judgment outline based on comments from G. Todd
Craig, Laura K.	10/24/2022	4.50	Conduct legal research regarding summary judgment briefing
Bonacorsi, Lauri A.	10/24/2022	1.30	Prepare analysis regarding individual signs, including what experts said about same
Todd, Gordon D.	10/24/2022	1.00	Further review and revision of draft outline for motion for summary judgment
Craig, Laura K.	10/25/2022	3.50	Conduct legal research regarding affirmative litigation options
Todd, Gordon D.	10/25/2022	0.50	Review further research regarding possible challenges to OFM illegal signs
Craig, Laura K.	10/26/2022	0.60	Attention to legal research regarding affirmative litigation options and summary judgment motion
Bonacorsi, Lauri A.	10/26/2022	2.60	Research case law relied upon by opposing party in anticipation for summary judgment
Craig, Laura K.	10/27/2022	1.00	Research regarding affirmative litigation options
Hay, Daniel J.	10/28/2022	0.20	Call with G. Todd, B. Katz re summary judgment ruling
Hay, Daniel J.	10/28/2022	0.50	Call with L. Mulherin, L. Bonacorsi re motion for summary judgment
Craig, Laura K.	10/28/2022	0.60	Research regarding affirmative litigation options to challenge OFM illegal signs
Craig, Laura K.	10/28/2022	0.60	Call with D. Hay and L. Bonacorsi regarding summary judgment draft
Bonacorsi, Lauri A.	10/28/2022	2.10	Research rules governing immediate appeal of grant of partial summary judgment including injunctive relief and conditional cross appeal
Bonacorsi, Lauri A.	10/28/2022	0.50	Call with D. Hay and L. Mulherin regarding motion for summary judgment
Todd, Gordon D.	10/28/2022	0.20	Attention to New Rochelle FOIL response
Todd, Gordon D.	10/28/2022	0.30	Call with B. Katz to discuss case alignment
Bonacorsi, Lauri A.	10/29/2022	0.30	Research procedural rules related to appeal of partial SJ
Bonacorsi, Lauri A.	10/30/2022	0.50	Research procedural rules related to appeal of partial SJ
Craig, Laura K.	10/31/2022	0.10	Prepare materials regarding motion for summary judgment
Bonacorsi, Lauri A.	10/31/2022	0.30	Research regarding case authority cited by opposing party in anticipation for summary judgment
Bonacorsi, Lauri A.	10/31/2022	5.00	Draft summary judgment motion
Ballard, Emma A.	10/31/2022	1.50	Assist L. Mulherin with preparing binders
Todd, Gordon D.	10/31/2022	0.20	Review research regarding necessity for conditional cross appeal from PMSJ grant
Todd, Gordon D.	10/31/2022	0.20	Correspondence with D. Chafizedah regarding settlement
Craig, Laura K.	11/1/2022	1.90	Draft memorandum regarding affirmative litigation options
Bonacorsi, Lauri A.	11/1/2022	0.10	Research background of case cited by opposing party in anticipation of summary judgment

Hay, Daniel J.	11/2/2022	1.30	Review deposition transcripts for use on summary judgment
Craig, Laura K.	11/2/2022	1.10	Revise draft memorandum regarding affirmative litigation options
Craig, Laura K.	11/2/2022	1.60	Prepare statement of undisputed material facts in support of summary judgment motion
Bonacorsi, Lauri A.	11/2/2022	0.60	Finalize affirmative challenge memorandum
Bonacorsi, Lauri A.	11/2/2022	2.70	Draft summary judgment motion
Todd, Gordon D.	11/2/2022	0.50	Call with D. Chafizadeh regarding settlement and report to S. Llach re same
Todd, Gordon D.	11/2/2022	1.10	Review and send email memo to S. Llach regarding sinage law research
Craig, Laura K.	11/3/2022	4.40	Draft statement of undisputed material facts, including review of case materials regarding same
Bonacorsi, Lauri A.	11/3/2022	1.30	Draft summary judgment motion
Todd, Gordon D.	11/3/2022	0.30	Attention to summary judgment draft and strategy and discuss same with D. Hay
Hay, Daniel J.	11/4/2022	0.50	Revise statement of material facts
Hay, Daniel J.	11/4/2022	0.70	Review and research response to motion for reconsideration
Hay, Daniel J.	11/4/2022	0.20	Call with L. Mulherin re motion for reconsideration
Craig, Laura K.	11/4/2022	0.30	Call with D. Hay regarding motion for reconsideration
			Prepare motion for summary judgment, including legal research regarding same and review of case record
Craig, Laura K.	11/4/2022	3.50	
Bonacorsi, Lauri A.	11/4/2022	0.50	Draft summary judgment motion
Bonacorsi, Lauri A.	11/4/2022	0.10	Research procedural rules regarding response to motion to reconsider
Todd, Gordon D.	11/4/2022	1.30	Review motion for reconsideration and email with S. Llach re same
Hay, Daniel J.	11/5/2022	2.00	Research and draft response to motion to compel
Craig, Laura K.	11/6/2022	2.30	Draft motion for summary judgment, including legal research regarding same
Hay, Daniel J.	11/7/2022	4.10	Draft response to motion for reconsideration
Craig, Laura K.	11/7/2022	5.40	Draft motion for summary judgment, including legal research regarding same
Craig, Laura K.	11/7/2022	0.60	Call with D. Hay and L. Bonacorsi regarding motion for summary judgment
Bonacorsi, Lauri A.	11/7/2022	0.70	Drafting of sections of summary judgment motion
Bonacorsi, Lauri A.	11/7/2022	4.80	Prepare arguments for response to motion for reconsideration
Bonacorsi, Lauri A.	11/7/2022	0.50	Research for summary judgment motion
			Work on opposition to motion for reconsideration including close review of motion and cited authorities, strategize regarding opposition and discussions re same with S. Llach and D. Hay
Todd, Gordon D.	11/7/2022	3.20	
Hay, Daniel J.	11/8/2022	1.60	Revise opposition to motion for reconsideration
DeVillier, Danielle	11/8/2022	1.50	Cite check submission with J. Meehan for D. Hay regarding opposition to motion for reconsideration.
Craig, Laura K.	11/8/2022	2.60	Prepare motion for summary judgment, including legal research regarding same
Craig, Laura K.	11/8/2022	0.30	Meeting with D. Hay regarding motion for summary judgment
Craig, Laura K.	11/8/2022	0.50	Review response to motion for reconsideration, including legal research regarding same
Bonacorsi, Lauri A.	11/8/2022	1.00	Conduct research in support of summary judgment motion
Todd, Gordon D.	11/8/2022	1.20	Review and revise draft opposition to motion to reconsider
Meehan, John	11/8/2022	2.30	Cite check opposition to motion for reconsideration, no. 7:20-cv-9296 (S.D.N.Y.)
Craig, Laura K.	11/9/2022	7.60	Draft motion for summary judgment, including legal research regarding same
Hay, Daniel J.	11/10/2022	1.20	Revise summary judgment motion
Craig, Laura K.	11/10/2022	3.60	Attention to drafting motion for summary judgment filings
Bonacorsi, Lauri A.	11/10/2022	0.20	Conduct research for summary judgment motion
			Review scope of prior FOIL requests to determine need for additional requests to cover Outfront documents
Todd, Gordon D.	11/11/2022	0.40	
Todd, Gordon D.	11/11/2022	0.80	Review reconsideration filings by City
Hay, Daniel J.	11/12/2022	2.90	Revise summary judgment motion
Hay, Daniel J.	11/13/2022	5.10	Revise summary judgment motion
Craig, Laura K.	11/13/2022	0.40	Review D. Hay comments to motion for summary judgment
Hay, Daniel J.	11/14/2022	3.60	Revise summary judgment motion
Craig, Laura K.	11/14/2022	7.90	Attention to preparing motion for summary judgment
Craig, Laura K.	11/14/2022	0.30	Research regarding FOIL requests
Bonacorsi, Lauri A.	11/14/2022	0.90	Prepare ancillary filings for motion for summary judgment
			Correspondence with S. Llach regarding FOIL requests to city and thruway regarding applications for OFM permits and review prior requests re same
Todd, Gordon D.	11/14/2022	0.40	
Hay, Daniel J.	11/15/2022	2.90	Revise summary judgment brief
Craig, Laura K.	11/15/2022	0.10	Call with L. Bonacorsi and E. Ballard regarding summary judgment exhibits
			Draft summary of reply in support of motion for reconsideration, including legal research regarding same
Craig, Laura K.	11/15/2022	0.90	
Craig, Laura K.	11/15/2022	6.80	Draft motion for summary judgment, ancillary filings, and statement of undisputed material facts, including legal research regarding same
Bonacorsi, Lauri A.	11/15/2022	0.10	Prepare exhibits for summary judgment motion
Bonacorsi, Lauri A.	11/15/2022	1.00	Prepare draft order for motion for summary judgment
Ballard, Emma A.	11/15/2022	1.50	Assist L. Mulherin with preparing exhibit list for upcoming filing
Hay, Daniel J.	11/16/2022	0.50	Review reply in support of motion for reconsideration
			Draft summary of defendants' reply in support of motion to reconsider, including legal research regarding same
Craig, Laura K.	11/16/2022	1.90	
Craig, Laura K.	11/16/2022	1.40	Draft ancillary filings for motion for summary judgment, including legal research regarding same
Bonacorsi, Lauri A.	11/16/2022	1.60	Prepare exhibits for summary judgment motion
Ballard, Emma A.	11/16/2022	1.70	Assist L. Mulherin with preparing exhibit list for upcoming filing
Todd, Gordon D.	11/16/2022	0.80	Review City's reply in support of motion to reconsider and discuss same with L. Mulherin and D. Hay
Hay, Daniel J.	11/17/2022	3.30	Review statement of undisputed material facts
Hay, Daniel J.	11/17/2022	0.70	Revise proposed order
Hay, Daniel J.	11/17/2022	1.50	Draft letter to Thruway Authority re Outfront billboards
Craig, Laura K.	11/17/2022	4.80	Attention to preparing motion for summary judgment and related filings
Bonacorsi, Lauri A.	11/17/2022	2.20	Prepare exhibits for summary judgment motion
Ballard, Emma A.	11/17/2022	0.70	Assist L. Mulherin with preparing exhibit list for upcoming filing

Todd, Gordon D.	11/17/2022	1.00	Begin reviewing and editing draft motion for summary judgment
Hay, Daniel J.	11/18/2022	1.40	Revise statement of undisputed material facts
Hay, Daniel J.	11/18/2022	4.60	Revise motion for summary judgment
DeVillier, Danielle	11/18/2022	4.00	Coordinate submission with J. Meehan for L. Mulherin regarding motion for summary judgment .
			Revise summary judgment motion and supporting filings, including legal and factual research
Craig, Laura K.	11/18/2022	8.30	regarding same
Craig, Laura K.	11/18/2022	0.30	Call with D. Hay and L. Bonacorsi regarding summary judgment briefing
Bonacorsi, Lauri A.	11/18/2022	0.30	Call with D. Hay and L. Mulherin on MSJ
Bonacorsi, Lauri A.	11/18/2022	1.30	Prepare exhibits for summary judgment motion
Bonacorsi, Lauri A.	11/18/2022	3.10	Revisions to motion for summary judgment
Todd, Gordon D.	11/18/2022	6.20	Continue reviewing and editing draft motion for summary judgment
Todd, Gordon D.	11/18/2022	0.20	Review and revise ancillary legal filings to accompany MSJ
Todd, Gordon D.	11/18/2022	1.90	Review and revise draft statement of undisputed material facts i/s/o motion for summary judgment
Meehan, John	11/18/2022	4.50	Initial preparation of submission, motion for summary judgment, no. 7:20-cv-9296 (S.D.N.Y.)
Hay, Daniel J.	11/19/2022	1.20	Revise motion for summary judgment
Hay, Daniel J.	11/19/2022	0.90	Revise statement of undisputed material facts
Bonacorsi, Lauri A.	11/19/2022	1.20	Research for motion for summary judgment related to propriety of certain City actions
Hay, Daniel J.	11/20/2022	1.20	Revise summary judgment motion and supporting papers
			Cite check submission with J. Meehan, A. Reed for L. Mulherin regarding motion for summary judgment .
DeVillier, Danielle	11/20/2022	8.30	
Craig, Laura K.	11/20/2022	2.30	Draft declaration in support of summary judgment motion, including preparation of exhibit set
Bonacorsi, Lauri A.	11/20/2022	1.00	Prepare exhibits for summary judgment motion
Bonacorsi, Lauri A.	11/20/2022	0.10	Research for motion for summary judgment related to propriety of certain City actions
Reed, Andrew R.	11/20/2022	7.80	Perform cite check on CCO-New Rochelle MSJ SUMF and MSJ Memorandum of Law for L. Mulherin
Todd, Gordon D.	11/20/2022	2.50	Final review and revisions of motion for summary judgment on remaining counts
Meehan, John	11/20/2022	10.30	Cite check submission, motion for summary judgment, no. 7:20-cv-9296 (S.D.N.Y.)
Meehan, John	11/20/2022	1.70	Cite check submission, statement of undisputed material facts, no. 7:20-cv-9296 (S.D.N.Y.)
Hay, Daniel J.	11/21/2022	5.70	Revise summary judgment filing
			Cite check submission with J. Meehan, A. Reed for L. Mulherin regarding motion for summary judgment .
DeVillier, Danielle	11/21/2022	4.00	
DeVillier, Danielle	11/21/2022	2.50	Finalize submission for filing with J. Meehan for L. Mulherin regarding motion for summary judgment .
Craig, Laura K.	11/21/2022	11.10	Prepare motion for summary judgment filing and exhibits
Bonacorsi, Lauri A.	11/21/2022	9.90	Finalize summary judgment motion, including brief, statement of facts, and exhibits
Ballard, Emma A.	11/21/2022	1.40	Assist L. Mulherin with preparing exhibits for summary judgment filing
Reed, Andrew R.	11/21/2022	6.50	Perform cite check on CCO-New Rochelle MSJ SUMF and MSJ Memorandum of Law for L. Mulherin
Todd, Gordon D.	11/21/2022	1.50	Final review and revisions to draft motion for summary judgment and finalize same
Meehan, John	11/21/2022	5.50	Assist in final preparation of submission, motion for summary judgment, no. 7:20-cv-9296 (S.D.N.Y.)
Meehan, John	11/21/2022	5.50	Cite check submission, motion for summary judgment, no. 7:20-cv-9296 (S.D.N.Y.)
Bonacorsi, Lauri A.	11/22/2022	0.20	Log summary judgment motion for records
Bonacorsi, Lauri A.	11/22/2022	0.40	Research defenses against permit revocation
Bonacorsi, Lauri A.	11/23/2022	0.50	Research defenses against permit revocation
Bonacorsi, Lauri A.	11/28/2022	1.40	Research defenses against permit revocation
Todd, Gordon D.	11/28/2022	0.60	Review Court's ruling on motion for reconsideration and correspond with S. Llach regarding same
Craig, Laura K.	11/29/2022	0.20	Review opinion denying motion for reconsideration
Bonacorsi, Lauri A.	11/29/2022	1.60	Research defenses against permit revocation
Todd, Gordon D.	11/29/2022	0.20	Correspondence with City counsel regarding settlement discussions
Todd, Gordon D.	12/5/2022	0.20	Correspondence with D. Chafizadeh regarding settlement discussions
Todd, Gordon D.	12/6/2022	0.20	Correspondence with D. Chafizadeh regarding settlement discussions
Todd, Gordon D.	12/19/2022	0.40	Call with D. Chafizadeh regarding possible settlement discussions
Hay, Daniel J.	12/23/2022	0.30	Research and draft response to FOIL request extension
Craig, Laura K.	1/9/2023	1.80	Analyze summary judgment filings regarding potential research questions
Bonacorsi, Lauri A.	1/9/2023	0.20	Provide analysis to L. Mulherin on prospective affirmative defenses of the City
			Call with D. Chafizadeh and follow-on correspondence with S. Llach regarding status of settlement discussions
Todd, Gordon D.	1/9/2023	0.30	
Hay, Daniel J.	1/10/2023	0.20	Review documents and transcripts for use in summary judgment opposition
Hay, Daniel J.	1/10/2023	0.60	Correspond w L. Mulherin re summary judgment research
Hay, Daniel J.	1/10/2023	0.60	Call with client to discuss settlement options and sign development strategy
Hay, Daniel J.	1/10/2023	0.80	Draft settlement proposals for Outfront and New Rochelle
Craig, Laura K.	1/10/2023	0.10	Review of summary judgment opposition research assignments
Craig, Laura K.	1/10/2023	0.30	Meeting with L. Bonacorsi regarding research
			Prepare for drafting of summary judgment response, including correspondence with L. Mulherin regarding research
Bonacorsi, Lauri A.	1/10/2023	0.50	
Bonacorsi, Lauri A.	1/10/2023	1.40	Research procedural issue related to preclusion
Todd, Gordon D.	1/10/2023	0.50	Call with S. Llach and New York market team regarding possibility of renewed settlement
Hay, Daniel J.	1/11/2023	0.40	Draft email to New Rochelle's counsel re settlement discussions
Bonacorsi, Lauri A.	1/12/2023	0.40	Research procedural issue related to preclusion
Bonacorsi, Lauri A.	1/12/2023	3.50	Fact-gathering in anticipation of summary judgment, focused on affirmative defenses
Bonacorsi, Lauri A.	1/12/2023	0.90	Conduct research related to excessive fines
Todd, Gordon D.	1/12/2023	0.40	Review legal research regarding OFM likely legal responses to attempts to remove its signs
Todd, Gordon D.	1/12/2023	1.00	Draft communication with City regarding renewed settlement discussion
Bonacorsi, Lauri A.	1/13/2023	2.70	Fact-gathering in anticipation of summary judgment, focused on affirmative defenses
Hay, Daniel J.	1/15/2023	0.30	Review research on collateral estoppel effect of Vector decision
Hay, Daniel J.	1/16/2023	0.50	Draft email to opposing counsel re extension request and grounds for opposing
Todd, Gordon D.	1/16/2023	0.30	Attention to correspondence with City regarding request for additional delay of due date for summary judgment opposition and cross-motion

Hay, Daniel J.	1/17/2023	0.90	Draft opposition to second request for extension of time
Craig, Laura K.	1/17/2023	0.70	Draft response to request for an extension, including call with D. Hay regarding same
Craig, Laura K.	1/20/2023	1.30	Research regarding summary judgment opposition
Hay, Daniel J.	1/21/2023	0.30	Review FOIL production by Thruway Authority
Craig, Laura K.	1/21/2023	1.00	Research regarding summary judgment response
Craig, Laura K.	1/23/2023	3.20	Research regarding summary judgment opposition
Bonacorsi, Lauri A.	1/23/2023	0.10	Attention to recent filings regarding summary judgment motion timing
Hay, Daniel J.	1/24/2023	0.80	Review research for summary judgment opposition brief
Craig, Laura K.	1/24/2023	2.90	Research regarding summary judgment opposition
Bonacorsi, Lauri A.	1/24/2023	3.30	Research on ripeness law related to excessive fines
			Research regarding summary judgment opposition, including review of L. Bonacorsi research and drafting summary of research
Craig, Laura K.	1/25/2023	4.80	
Bonacorsi, Lauri A.	1/25/2023	0.10	Research on ripeness law related to excessive fines
Craig, Laura K.	1/26/2023	4.20	Research regarding opposition preparation for summary judgment motion, including drafting responses to D. Hay questions regarding same
Bonacorsi, Lauri A.	1/26/2023	0.50	Fact-gathering to support motion for summary judgment response
Bonacorsi, Lauri A.	1/26/2023	3.80	Research on ripeness law related to excessive fines
Hay, Daniel J.	1/27/2023	0.30	Review summary judgment research
Hay, Daniel J.	1/27/2023	1.20	Review New Rochelle's summary judgment filing
Hay, Daniel J.	1/27/2023	3.00	Research and outline summary judgment reply
Craig, Laura K.	1/27/2023	1.30	Review of summary judgment opposition, including call with D. Hay regarding same
			Fact-gathering in anticipation of drafting summary judgment response related to City's communications with CCO
Bonacorsi, Lauri A.	1/27/2023	0.60	
Hay, Daniel J.	1/28/2023	6.00	Draft response to counter statement of undisputed material facts
Bonacorsi, Lauri A.	1/28/2023	2.60	Review New Rochelle summary judgment filings
Bonacorsi, Lauri A.	1/28/2023	0.30	Analysis of outline for summary judgment response
Bonacorsi, Lauri A.	1/28/2023	1.40	Research for summary judgment response related to statutory interpretation rules
Bonacorsi, Lauri A.	1/28/2023	0.30	Locate support in the record for various assertions to be included in summary judgment response
Hay, Daniel J.	1/29/2023	0.40	Draft response to counter statement of undisputed material facts
Craig, Laura K.	1/29/2023	0.10	Correspondence with internal team regarding summary judgment research
Hay, Daniel J.	1/30/2023	1.10	Research opposition to summary judgment cross motion
Hay, Daniel J.	1/30/2023	0.60	Meet with L. Mulherin, L. Bonacorsi re summary judgment opposition
			Research regarding summary judgment response, including review of opposition filing and drafting response plan
Craig, Laura K.	1/30/2023	2.20	
Craig, Laura K.	1/30/2023	0.50	Meeting with D. Hay and L. Bonacorsi regarding summary judgment response
Bonacorsi, Lauri A.	1/30/2023	1.80	Prepare materials related to City's filing in anticipation of drafting response
Bonacorsi, Lauri A.	1/30/2023	0.10	Analysis on summary judgment response outline
Bonacorsi, Lauri A.	1/30/2023	0.50	Meeting with D. Hay and L. Mulherin regarding MSJ response
Ballard, Emma A.	1/30/2023	1.50	Assist L. Bonacorsi with preparing binders of parties' briefing and exhibits
Hay, Daniel J.	1/31/2023	0.40	Research summary judgment cross motion
Hay, Daniel J.	2/1/2023	4.60	Draft summary judgment opposition
Craig, Laura K.	2/1/2023	2.10	Research regarding zoning takings challenge question
Craig, Laura K.	2/1/2023	1.00	Attention to preparing summary judgment response
			Review New Rochelle summary judgment filings and response outline in anticipation of drafting response
Bonacorsi, Lauri A.	2/1/2023	1.30	
Hay, Daniel J.	2/2/2023	0.60	Draft response to New Rochelle's statement of undisputed material facts
Craig, Laura K.	2/2/2023	0.10	Review summary table of undisputed material facts
			Analysis of prospective arguments for response to summary judgment motion/opposition, including on affirmative defenses
Bonacorsi, Lauri A.	2/2/2023	1.90	
Ballard, Emma A.	2/2/2023	1.70	Assist L. Mulherin with preparing table of NR SUMF
Hay, Daniel J.	2/3/2023	2.40	Draft response to statement of undisputed facts
Hay, Daniel J.	2/3/2023	1.00	Draft opposition to summary judgment cross-motion
Craig, Laura K.	2/3/2023	0.30	Attention to preparing summary judgment response
			Analysis of prospective arguments for response to summary judgment motion/opposition, including on issues of affirmative defenses and statutory interpretation
Bonacorsi, Lauri A.	2/3/2023	4.60	
Todd, Gordon D.	2/3/2023	6.80	Review City's opposition and cross motion on summary judgment and related statement of facts and exhibits and provide comments on same to S. Llach
Hay, Daniel J.	2/4/2023	3.40	Draft opposition to cross motion for summary judgment
Hay, Daniel J.	2/4/2023	0.90	Draft response to statement of undisputed material facts
			Analysis of prospective arguments for response to summary judgment motion/opposition, including on issues of affirmative defenses and statutory interpretation
Bonacorsi, Lauri A.	2/4/2023	1.10	
Craig, Laura K.	2/6/2023	0.10	Correspondence regarding summary judgment response planning
			Draft sections of summary judgment response, including research on qualified immunity and affirmative defenses
Bonacorsi, Lauri A.	2/6/2023	3.90	
Hay, Daniel J.	2/7/2023	1.10	Meet with G. Todd, L. Craig re response to summary judgment cross motion
Hay, Daniel J.	2/7/2023	0.20	Draft opposition to motion for summary judgment
Craig, Laura K.	2/7/2023	0.10	Prepare for internal meeting regarding summary judgment response
Craig, Laura K.	2/7/2023	1.00	Meeting with G. Todd and D. Hay regarding response to motion to summary judgment
Bonacorsi, Lauri A.	2/7/2023	1.30	Analysis of responses to SUMF
Todd, Gordon D.	2/7/2023	1.00	Conference with D. Hay and L. Craig regarding response to cross-motion for summary judgment
Hay, Daniel J.	2/8/2023	2.20	Draft opposition to cross motion for summary judgment
Craig, Laura K.	2/9/2023	0.10	Review L. Bonacorsi research regarding qualified immunity
			Analysis of prospective arguments for response to summary judgment motion/opposition, including on issues of affirmative defenses and statutory interpretation
Bonacorsi, Lauri A.	2/9/2023	1.70	
Bonacorsi, Lauri A.	2/15/2023	4.80	Draft sections of summary judgment response, including related to affirmative defenses and breach of stipulation

Hay, Daniel J.	2/17/2023	0.20	Review FOIL production
Bonacorsi, Lauri A.	2/17/2023	1.80	Draft sections of brief related to breach of contract
Bonacorsi, Lauri A.	2/20/2023	1.90	Draft sections of summary judgment response, including related to affirmative defenses and breach of stipulation
Bonacorsi, Lauri A.	2/22/2023	0.10	Revisions to summary judgment response brief
Bonacorsi, Lauri A.	2/23/2023	3.20	Research for summary judgment related to preemption
Hay, Daniel J.	2/24/2023	0.80	Draft summary judgment opposition brief
Bonacorsi, Lauri A.	2/24/2023	1.10	Research for summary judgment related to preemption
Hay, Daniel J.	2/25/2023	4.70	Review and revise L. Bonacorsi's draft opposition to summary judgment
Bonacorsi, Lauri A.	2/25/2023	1.60	Revisions to summary judgment response brief
Todd, Gordon D.	2/25/2023	0.30	Review and respond to inquiry from S. Llach originating from Landmark realty regarding removal obligation and status of 30 Grove sign
Craig, Laura K.	2/26/2023	1.00	Draft summary judgment response
Bonacorsi, Lauri A.	2/26/2023	3.00	Revisions to summary judgment response brief, focusing on equitable defenses
Bonacorsi, Lauri A.	2/27/2023	4.90	Revisions to summary judgment response brief, including drafting certain equitable defense-related arguments and record citations throughout
Hay, Daniel J.	2/28/2023	1.00	Draft summary judgment opposition brief
Hay, Daniel J.	2/28/2023	2.60	Draft responses to statement of material facts
Craig, Laura K.	2/28/2023	1.80	Draft summary judgment response
Bonacorsi, Lauri A.	2/28/2023	1.40	Revisions to summary judgment response brief, including drafting certain equitable defense-related arguments and record citations throughout
Bonacorsi, Lauri A.	2/28/2023	2.50	Conduct research in support of motion for summary judgment response brief
Craig, Laura K.	3/1/2023	6.40	Draft motion for summary judgment response
Hay, Daniel J.	3/2/2023	1.70	Revise summary judgment opposition
Craig, Laura K.	3/2/2023	7.90	Draft motion for summary judgment response
Hay, Daniel J.	3/3/2023	6.70	Revise motion for summary judgment
Craig, Laura K.	3/3/2023	7.60	Draft motion for summary judgment reply and response
Bonacorsi, Lauri A.	3/3/2023	1.60	Revisions to summary judgment response brief, focusing on record and legal cites and equitable defense section
Hay, Daniel J.	3/4/2023	3.50	Revise summary judgment opposition brief
Craig, Laura K.	3/4/2023	2.20	Revise draft motion for summary judgment
Bonacorsi, Lauri A.	3/4/2023	1.00	Revisions to summary judgment response brief, focusing on record and legal cites and equitable defense section
Craig, Laura K.	3/5/2023	4.40	Draft response to statement of undisputed material facts and reply to Defendants' response to our statement of undisputed material facts
Hay, Daniel J.	3/6/2023	4.70	Revise response to statement of undisputed material facts
Craig, Laura K.	3/6/2023	0.20	Review motion for summary judgment draft
Bonacorsi, Lauri A.	3/6/2023	0.60	Revisions to summary judgment response draft
Hay, Daniel J.	3/7/2023	1.70	Revise response to statement of undisputed facts
Craig, Laura K.	3/7/2023	3.40	Draft response to statement of undisputed material facts
Bonacorsi, Lauri A.	3/7/2023	1.40	Revisions to summary judgment response draft
Bonacorsi, Lauri A.	3/7/2023	0.60	Review of Scharfberg deposition exhibits for motion for summary judgment filings
Todd, Gordon D.	3/7/2023	5.20	Review and revise draft reply/cross-opposition on summary judgment
Hay, Daniel J.	3/8/2023	4.70	Revise response to statement of undisputed material facts
Craig, Laura K.	3/8/2023	0.90	Attention to finalizing statement of undisputed material fact response
Bonacorsi, Lauri A.	3/8/2023	0.50	Review of depositions for motion for summary judgment briefing
Todd, Gordon D.	3/8/2023	6.80	Continue to review and revise draft reply/cross-opposition on summary judgment
Hay, Daniel J.	3/9/2023	2.40	Revise summary judgment opposition brief
Craig, Laura K.	3/9/2023	0.50	Attention to preparing summary judgment brief and supporting papers
Bonacorsi, Lauri A.	3/9/2023	1.30	Revisions to summary judgment response draft
Todd, Gordon D.	3/9/2023	6.50	Review and revise draft response to City's statement of undisputed fact in support of cross motion for summary judgment
Hay, Daniel J.	3/10/2023	1.40	Revise summary judgment opposition and reply
Hay, Daniel J.	3/10/2023	0.50	Meet and confer re confidentiality designations in summary judgment briefing
Craig, Laura K.	3/10/2023	1.00	Attention to preparing motion for summary judgment response
Craig, Laura K.	3/10/2023	0.50	Call with D. Hay and J. Nonkes regarding motions for summary judgment
Bonacorsi, Lauri A.	3/10/2023	3.90	Revisions to summary judgment response draft
Hay, Daniel J.	3/11/2023	3.80	Revise responses to statement of undisputed facts
Hay, Daniel J.	3/13/2023	3.30	Revise summary judgment reply brief
Craig, Laura K.	3/13/2023	4.20	Revise statement of undisputed material facts response
Bonacorsi, Lauri A.	3/13/2023	1.80	Revisions to summary judgment response draft, including locating factual support in record
Hay, Daniel J.	3/14/2023	1.00	Review statement of undisputed material facts
Hay, Daniel J.	3/14/2023	1.50	Revise summary judgment opposition and reply
Craig, Laura K.	3/14/2023	2.50	Attention to preparing summary judgment filing, including drafting and researching section on remedies, reviewing draft response to statement of undisputed material facts, and preparing exhibits
Bonacorsi, Lauri A.	3/14/2023	3.90	Prepare exhibits for summary judgment filing
Ballard, Emma A.	3/14/2023	0.60	Assist L. Bonacorsi with redacting and sealing exhibits
Hay, Daniel J.	3/15/2023	0.60	Revise summary judgment opposition brief
Hay, Daniel J.	3/15/2023	0.50	Review Thruway FOIL production
Hay, Daniel J.	3/15/2023	0.80	Draft declaration re Gros subpoena
DeVillier, Danielle	3/15/2023	3.00	Cite check submission with J. Meehan for L. Craig regarding summary judgment cross-opp and reply.
Craig, Laura K.	3/15/2023	0.70	Review NY Thruway FOIL response
Bonacorsi, Lauri A.	3/15/2023	3.40	Prepare exhibits for summary judgment filing
Pagdilao, Dexter L.	3/15/2023	0.10	Correspondence with L. Craig regarding Summary Judgment cite check

Pagdilao, Dexter L.	3/15/2023	0.10	Correspondence with J. Meehan and D. DeVillier regarding Summary Judgment cite check coordination
Pagdilao, Dexter L.	3/15/2023	1.40	Review Clear Channel's Consolidated Opposition to Defendants' Cross-Motion for Summary Judgment and Reply
Todd, Gordon D.	3/15/2023	1.90	Further review and revision of draft summary judgment motion
Todd, Gordon D.	3/15/2023	0.30	Review documents produced by Thruway pursuant to FOIL request
Meehan, John	3/15/2023	4.50	Cite check opposition and reply in support of motion for summary judgment, case no. 7:20-cv-9296 (S.D.N.Y.)
Hay, Daniel J.	3/16/2023	0.30	Review summary judgment exhibits
Hay, Daniel J.	3/16/2023	1.00	Revise statement of undisputed material facts
Hay, Daniel J.	3/16/2023	1.30	Revise opposition to motion for summary judgment
DeVillier, Danielle	3/16/2023	5.80	Cite check submission with J. Meehan for L. Craig regarding summary judgment cross-opp and reply.
Craig, Laura K.	3/16/2023	2.00	Attention to preparing summary judgment response, including drafting and legal research regarding same
Bonacorsi, Lauri A.	3/16/2023	3.90	Prepare exhibits for summary judgment filing, including locating new exhibits and cite checking existing exhibits
Ballard, Emma A.	3/16/2023	0.60	Assist L. Bonacorsi with redacting and sealing exhibits
Pagdilao, Dexter L.	3/16/2023	0.70	Draft list of record citations regarding factual cite check
Pagdilao, Dexter L.	3/16/2023	5.30	Analyze Clear Channel's Consolidated Opposition to Defendants' Cross-Motion for Summary Judgment and Reply regarding factual citations for accuracy
Pagdilao, Dexter L.	3/16/2023	0.30	Correspondence with D. DeVillier and J. Meehan regarding Summary Judgment brief and supporting Statements of Fact cite check
Meehan, John	3/16/2023	1.50	Draft, revise table of authorities, opposition and reply in support of motion for summary judgment, case no. 7:20-cv-9296 (S.D.N.Y.)
Meehan, John	3/16/2023	8.50	Cite check opposition and reply in support of motion for summary judgment, case no. 7:20-cv-9296 (S.D.N.Y.)
DeVillier, Danielle	3/17/2023	3.50	Cite check submission with D. Pagdilao and K. Handschuh for L. Craig regarding summary judgment cross-opp and reply.
Bonacorsi, Lauri A.	3/17/2023	2.00	Prepare exhibits for summary judgment filing
Bahnson, Maggie K.	3/17/2023	3.00	Help out D. DeVillier on cite check
Handschochuh, Kelsey R.	3/17/2023	6.00	Begin cite-checking SUMF with D. DeVillier and M. Bahnson
Pagdilao, Dexter L.	3/17/2023	6.30	Analyze Response to Counter Statement of Undisputed Material Facts regarding factual accuracy
Pagdilao, Dexter L.	3/17/2023	0.80	Revise Consolidated Opposition to Defendants' Cross-Motion for Summary Judgment and Reply
Pagdilao, Dexter L.	3/17/2023	0.10	Correspondence with L. Craig regarding Summary Judgment cite check status
Pagdilao, Dexter L.	3/17/2023	0.90	Revise Response to Counter Statement of Undisputed Material Facts
Pagdilao, Dexter L.	3/17/2023	0.40	Correspondence with D. DeVillier regarding Summary Judgment revisions coordination
DeVillier, Danielle	3/18/2023	2.00	Cite check submission with D. Pagdilao and K. Handschuh for L. Craig regarding summary judgment cross-opp and reply.
Handschochuh, Kelsey R.	3/18/2023	3.50	Finish SUMF cite check and turn back to D. DeVillier, D. Padlgo, and J. Meehan
Pagdilao, Dexter L.	3/18/2023	2.10	Revise Response to Counter Statement of Undisputed Material Facts
Pagdilao, Dexter L.	3/18/2023	0.30	Correspondence with D. DeVillier regarding revisions to Summary Judgment Statements of Facts
Pagdilao, Dexter L.	3/18/2023	1.10	Revise Reply to Defendants' Response to Statement of Undisputed Material Facts
Hay, Daniel J.	3/19/2023	1.10	Revise opposition to motion for summary judgment
Craig, Laura K.	3/19/2023	4.50	Attention to drafting and preparing motion for summary judgment and supporting papers
Hay, Daniel J.	3/20/2023	4.30	Revise summary judgment opposition and reply
Hay, Daniel J.	3/20/2023	3.80	Revise statements of undisputed material fact
Hay, Daniel J.	3/20/2023	1.00	Proof, finalize, and serve summary judgment filing
DeVillier, Danielle	3/20/2023	2.00	Finalize submission for filing with J. Meehan for L. Craig regarding summary judgment cross-opp and reply.
Craig, Laura K.	3/20/2023	5.00	Finalize motion for summary judgment response
Bonacorsi, Lauri A.	3/20/2023	6.00	Finalize summary judgment filing
Ballard, Emma A.	3/20/2023	0.20	Assist L. Bonacorsi with redacting and sealing exhibits
Meehan, John	3/20/2023	4.50	Cite check final version, opposition and reply in support of motion for summary judgment, case no. 7:20-cv-9296 (S.D.N.Y.)
Craig, Laura K.	3/30/2023	2.20	Draft motion to seal, including legal research regarding same
Hay, Daniel J.	3/31/2023	0.40	Review Fifth Circuit opinion in Regan for potential effect on summary judgment argument
Hay, Daniel J.	3/31/2023	1.00	Revise motion to seal summary judgment filing and review filing
Craig, Laura K.	3/31/2023	1.60	Draft motion to seal
Craig, Laura K.	3/31/2023	0.50	Attention to summary judgment filings, including review of City of Austin decision and correspondence regarding exhibits
Todd, Gordon D.	3/31/2023	0.60	Review Fifth Circuit ruling in City of Austin on remand for impact on New Rochelle summary judgment motion
Hay, Daniel J.	4/3/2023	0.30	Call with J. Nonkes re sealing summary judgment filing
Craig, Laura K.	4/3/2023	0.30	Call with D. Hay and J. Nonkes regarding sealed filings
Craig, Laura K.	4/3/2023	1.80	Prepare sealed filings for summary judgment filing
Bonacorsi, Lauri A.	4/3/2023	1.60	Preparation for filing of summary judgment materials
Hay, Daniel J.	4/4/2023	0.70	Review and QC summary judgment filing
Craig, Laura K.	4/4/2023	4.80	Attention to filing summary judgment motion papers
Bonacorsi, Lauri A.	4/4/2023	0.80	Preparation for filing of summary judgment motion and accompanying documents
Bonacorsi, Lauri A.	4/4/2023	0.40	Review New Rochelle reply
Todd, Gordon D.	4/4/2023	0.20	Review motion to seal exhibits
Todd, Gordon D.	4/4/2023	3.80	Review and analyze City's reply i/s/o of City's cross-motion for summary judgment
Hay, Daniel J.	4/5/2023	0.30	Review revised motion to seal
Craig, Laura K.	4/5/2023	0.60	Draft revised motion to seal per Court order
Craig, Laura K.	4/6/2023	1.30	Attention to revising motion to seal regarding Court's order
Bonacorsi, Lauri A.	4/6/2023	0.80	Assist in preparation of motion to seal

Bonacorsi, Lauri A.	4/6/2023	3.60	Prepare courtesy copies for court, including downloading and organizing files from PACER, drafting cover letter, and preparing transmittal
Ballard, Emma A.	4/6/2023	1.00	Assist L. Bonacorsi with shipping out SJ courtesy copy binders
DeVillier, Danielle	4/7/2023	1.50	Coordinate shipment of exhibit binders for L. Bonacorsi.
Craig, Laura K.	4/7/2023	0.10	Attention to exhibit filing issue
Bonacorsi, Lauri A.	4/7/2023	0.50	Finalize courtesy copies for court
Craig, Laura K.	4/10/2023	0.10	Attention to resolving exhibit filing matter
Bonacorsi, Lauri A.	4/10/2023	0.10	Correspondence regarding potential technical PACER filing error for one exhibit
Bonacorsi, Lauri A.	4/11/2023	0.60	Draft cover letter and prepare exhibit for filing in light of ECF error
Craig, Laura K.	4/12/2023	0.10	Attention to exhibit filing issue
Bonacorsi, Lauri A.	4/12/2023	0.30	Prepare email to court regarding technical issue with CM/ECF
Craig, Laura K.	4/13/2023	0.20	Correspondence with Court regarding exhibit filing issue
Todd, Gordon D.	4/16/2023	0.40	Review documents produced by Thruway authority pursuant to FOIL request
Craig, Laura K.	4/17/2023	0.10	Correspondence with Court regarding exhibit
Bonacorsi, Lauri A.	4/18/2023	0.20	Assist in re-filing of exhibit due to technical issues
Todd, Gordon D.	4/18/2023	0.30	Correspondence with S. Llach, J. Scharfberg regarding settlement options
Todd, Gordon D.	4/18/2023	0.30	Correspondence with counsel for City regarding possibility of resuming settlement discussions and discuss same with client and D. Hay
Todd, Gordon D.	4/19/2023	0.30	Correspondence with client regarding possible renewed settlement options
Todd, Gordon D.	4/19/2023	0.50	Draft correspondence to City conveying new settlement terms
Todd, Gordon D.	5/8/2023	0.50	Correspondence with D. Chafizadeh and S. Llach regarding settlement offers
Todd, Gordon D.	5/10/2023	0.40	Draft and send revised settlement offer to New Ro
Hay, Daniel J.	5/25/2023	0.30	Correspond with G. Todd re settlement proposal based on review of prior research on digitization
Todd, Gordon D.	5/26/2023	0.50	Review new legal authorities relating to arguments raised in summary judgment motion
Craig, Laura K.	5/30/2023	0.30	Review Tyler case regarding potential updates to court
Craig, Laura K.	6/1/2023	0.30	Draft email to client regarding cannabis research
Hay, Daniel J.	6/9/2023	0.80	Draft email to S. Llach re settlement strategy
Todd, Gordon D.	6/9/2023	0.30	Review research into impact of City code on application for digitization permits and strategize as to best path forward
Hay, Daniel J.	6/11/2023	0.40	Research timing for challenging denial of building permit and effect of party timing stipulation
Craig, Laura K.	6/20/2023	0.40	Review Tyler v. Hennepin case regarding updated case law
Todd, Gordon D.	7/27/2023	0.40	Review correspondence from New Rochelle regarding digital conversion applications and reply to S. Llach regarding same
Hay, Daniel J.	8/4/2023	0.40	Review and revise research on permit grandfathering
Todd, Gordon D.	8/4/2023	0.30	Review and send response to S. Llach inquiry into law applicable to stayed digital permit applications
Todd, Gordon D.	4/14/2024	1.00	Review new Supreme Court authority regarding administrative takings and nexus requirement to government interest as relevant to taking claim against New Rochelle
Todd, Gordon D.	4/15/2024	0.80	Review summary judgment briefing with respect to takings argument and email S. Llach regarding possible supplemental filing
Hay, Daniel J.	4/16/2024	1.30	Draft notice of supplemental authority
Todd, Gordon D.	4/16/2024	0.30	Review and revise submission regarding new takings authority
Hay, Daniel J.	4/17/2024	0.30	Revise and file notice of supplemental authority
Pagdilao, Dexter L.	5/1/2024	0.70	Research court and chamber rules regarding attorney withdrawal requirements (L. Craig)
Pagdilao, Dexter L.	5/2/2024	0.90	Research court rules and call with clerk regarding hearing transcript request protocols and requirements
Hay, Daniel J.	5/7/2024	0.80	Review opinion in New Rochelle matter
Hay, Daniel J.	5/7/2024	1.20	Draft emails to client and G. Todd summarizing decisions and next steps
Todd, Gordon D.	5/7/2024	1.00	Review summary judgment opinion and correspond with D. Hay and S. Llach re same
Ehrett, Mackenzi J.S.	5/8/2024	1.80	Research 2nd Cir and SDNY authority and practice for filing fee petitions for successful 1983 claim and draft summary of the same to D. Hay
Todd, Gordon D.	5/8/2024	0.20	Correspondence with New Rochelle counsel regarding settlement talks
Ehrett, Mackenzi J.S.	5/9/2024	0.50	Research follow up questions re: potential appeal of partial denial of summary judgment and strategize with D. Hay re the same
Todd, Gordon D.	5/9/2024	0.40	Review research regarding fee claim for Section 1983 claim and strategize regarding same
Todd, Gordon D.	5/9/2024	0.20	Review order from court regarding sanctions motions and forward same to S. Llach
Hay, Daniel J.	5/22/2024	0.30	Call with opposing counsel re summary judgment ruling and next steps
Todd, Gordon D.	5/22/2024	0.70	Prepare for and host call with City counsel regarding settlement and appeal and follow-on call with S. Llach regarding same
Hay, Daniel J.	5/28/2024	0.50	Draft post-summary judgment letter to New Rochelle re resolution
Todd, Gordon D.	5/28/2024	0.50	Strategize regarding settlement, timing, and appeal
Hay, Daniel J.	6/3/2024	0.30	Draft application for two-month continuance
Hay, Daniel J.	7/8/2024	0.50	Review and comment on summer associate memo re arguments on appeal
Hay, Daniel J.	7/11/2024	1.10	Review and comment on attorney's fees memo
Hay, Daniel J.	7/19/2024	0.60	Revise memo on appellate analysis
Hay, Daniel J.	7/20/2024	0.50	Revise memo on appellate options
Hay, Daniel J.	7/20/2024	1.00	Review and revise memorandum on attorneys fees procedure
Todd, Gordon D.	7/22/2024	1.10	Review research regarding cross appeal
Todd, Gordon D.	7/22/2024	0.90	Review research re attorney fees claim
Hay, Daniel J.	7/23/2024	0.50	Meet with K. Ziemnick re appellate analysis
Hay, Daniel J.	8/27/2024	0.40	Draft letter to court re dismissal of remaining claim and stay of fee briefing
Todd, Gordon D.	8/27/2024	0.50	Correspondence with S. Llach regarding status of digital conversions including reviewing prior correspondence and analysis of the conversion issue and discuss same with D. Hay
Hay, Daniel J.	9/3/2024	0.20	Draft email to opposing counsel re status conference and potential settlement
Todd, Gordon D.	9/6/2024	0.20	Correspondence with city counsel
Todd, Gordon D.	9/11/2024	0.40	Discussions with City lawyer regarding possible settlement terms

Hay, Daniel J.	9/16/2024	0.50	Draft talking points for Sept. 18 status conference
Todd, Gordon D.	9/17/2024	0.40	Call with B. Katz regarding status conference
Hay, Daniel J.	9/18/2024	0.30	Attend status conference
Hay, Daniel J.	9/19/2024	0.40	Call with opposing counsel re mediation
Todd, Gordon D.	9/19/2024	0.60	Attention to correspondence with City counsel and follow-on discussions with S. Llach regarding settlement demand
Hay, Daniel J.	10/17/2024	0.90	Draft settlement offer to New Rochelle
Hay, Daniel J.	10/18/2024	0.40	Revise settlement proposal
Todd, Gordon D.	10/18/2024	0.40	Review and revise drafts of settlement proposal and communicate re same with D. Hay
Hay, Daniel J.	10/31/2024	0.30	Draft request to continue status conference
Hay, Daniel J.	10/31/2024	0.50	Email S. Llach re Outfront New Rochelle deal and settlement history
Hay, Daniel J.	11/1/2024	0.50	Locate and circulate OFM-New Rochelle contract
Hay, Daniel J.	11/1/2024	0.80	Correspond with client re settlement strategy
Todd, Gordon D.	11/1/2024	0.30	Correspondence with S. Llach and D. Hay regarding possible resolutions in New Rochelle, attorney fees, and risks of third party litigation
Hay, Daniel J.	11/5/2024	0.30	Revise settlement offer
Hay, Daniel J.	11/5/2024	0.80	Review discovery for New Rochelle revenue information and draft FOIL request for same
Todd, Gordon D.	11/5/2024	0.50	Attention to settlement offer including correspondence with S. Llach, review proposed terms, review draft letter to City, confer with D. Hay re same, and send settlement offer to New Rochelle
Todd, Gordon D.	11/18/2024	0.20	Attention to correspondence with City regarding status update for Court
Hay, Daniel J.	11/20/2024	0.30	Correspond with G. Todd, S. Llach re New Rochelle settlement offer
Todd, Gordon D.	11/26/2024	0.20	Correspondence with D. Chafizedah regarding settlement terms
Hay, Daniel J.	12/1/2024	0.30	Draft motion to continue December status conference
Hay, Daniel J.	12/17/2024	0.50	Prepare talking point for December 18 status conference
Hay, Daniel J.	12/18/2024	0.80	Draft proposed order
Hay, Daniel J.	12/18/2024	0.30	Attend status conference
Hay, Daniel J.	1/2/2025	0.30	Revise and file proposed final order